

Implementation of the National Strategy against Foreign Interference and Disinformation:

Electoral Integrity, Media Resilience, and Public Awareness

Assessment of Objectives I and IV in the first six months of implementation



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ALBANIA

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Partnership | Progress | Prosperity

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EXECUTIVE SUMMARY

The National Strategy against Foreign Interference and Disinformation 2025–2030 was presented as Albania’s institutional response to an increasingly visible problem, namely information manipulation, the influence of foreign actors, and the weaknesses of institutions themselves in dealing with disinformation. The report assesses the first six months of implementation of Objectives I and IV of the Strategy, which relate to the protection of electoral processes, the transparency of political financing, strengthening the media environment, and increasing public awareness. In a nutshell, this initial assessment seeks to understand whether the Strategy is being converted into concrete action.

The main finding is that, during the monitoring period, the Strategy has generated more planning than results. Of the 28 measures analysed, none has been fully implemented. For most of them (around 64%), there is no visible progress or insufficient information to determine whether any progress has been made. Only 36% of the measures are in the early stages of planning or implementation.

The data suggest that, during the first six months, institutions focused on the more achievable measures, such as training sessions, coordination meetings, cooperation with international partners, and general capacity-building efforts. Meanwhile, the more complex measures that require greater coordination, resources, and political responsibility such as legal amendments, the creation of new structures, digital systems for the transparency of political financing, or monitoring mechanisms, have largely remained stalled.

On media literacy, the report notes that there is relatively greater awareness of the importance of independent journalism, fact-checking, and citizens’ digital skills. However, these priorities have not yet been accompanied by concrete policies, funding, or sustainable programmes. For example, training for journalists, support for civil society organisations, and the integration of media literacy into schools have all been envisaged, but most of these measures remain to be implemented.

One of the clearest weaknesses identified in the report is the absence of a clear mechanism for overseeing the implementation of the Strategy. The parliamentary committee that drafted the Strategy ended its mandate as soon as the Strategy was approved and was not replaced by a new monitoring mechanism. Although the Strategy foresees the adoption of an Action Plan by the Council of Ministers within 2025 and the establishment of a dedicated structure for its coordination, neither of these mechanisms had been put in place by the time the report was published. This has hindered the start of implementation for some of the responsible institutions

(70% of institutions had not started implementation) and has directly affected the limited pace of progress. As a result, the Strategy has been left without an institutional “centre of gravity.”

The implementation of the Strategy has also highlighted shortcomings in its design phase, as several responsible institutions argued that the measures assigned to them fall outside their legal competences or field of activity. This suggests that the allocation of institutional responsibilities was not always clear and may affect the feasibility of implementing some of the Strategy’s measures.

Overall, the report presents a Strategy that is moving slowly and without a clear direction in practice. The findings suggest that institutions’ capacity to build functional and sustainable mechanisms against disinformation and foreign interference remains fragile and, if current trends continue, the Strategy is likely to remain a commitment without tangible results.

1. CONTEXT

Foreign manipulation and interference in the information space has become one of the main forms of hybrid threats to modern democracies. The deliberate spread of disinformation, propaganda, and information manipulation seeks to influence public opinion, undermine trust in democratic institutions, and weaken decision-making processes.

Over the past decade, the information environment—especially the digital sphere—has turned into a battleground of geopolitical rivalry, where state and non-state actors use technology to amplify manipulative narratives and influence political and social processes. In this context, at the international level, including within the European Union and NATO, efforts have intensified to develop policies, monitoring mechanisms, and cooperation instruments to identify and counter these threats.

In Albania, concerns about foreign interference and the spread of disinformation have increased in parallel with these global developments, but also due to internal factors related to the vulnerability of the information and institutional environment. Limited interinstitutional coordination, insufficient capacities, and the lack of an independent monitoring mechanism have constrained the ability to address these phenomena.

At the same time, the media landscape in the country suffers from high ownership concentration, lack of transparency in media financing, and limited capacities for professional fact-checking. Many media outlets lack clear editorial policies or adherence to journalistic ethical standards.

Meanwhile, the lack of regulation of digital platforms has enabled the rapid spread of unverified content without accountability. These factors, combined with low levels of media and digital literacy, limited public trust in institutions, and a highly polarized political environment, have created fertile ground for the spread of disinformation by both domestic and foreign actors.

Albania's NATO membership and its European Union integration process also place the country within broader geopolitical dynamics in the information space. Studies show that foreign actors, including Russia, China, and Iran, have exploited these vulnerabilities to promote narratives aimed at fostering division and misinformation in public opinion. However, there is no clear evidence regarding the extent to which these efforts have directly influenced public opinion on sensitive political and social issues.

To coordinate institutional actions addressing these concerns, in 2024 the Parliament established a Special Committee against Disinformation and Other Forms of Foreign Interference in the country's democratic processes. The need for an institutional approach was clear; however, the creation of this committee was criticized by civil society and media organizations. Criticism focused on concerns about potential impacts on freedom of expression, due to the unclear mandate, risks of politicization, and fears that the committee could be instrumentalized to restrict media freedom. According to critics, most disinformation in Albania originates from domestic actors and could be addressed through existing institutions.

The committee was tasked with coordinating and overseeing institutional efforts to address disinformation and external influences in Albania's informational and political space. Within its mandate, the committee drafted the National Strategy against Foreign Interference and Disinformation 2025–2030 (hereafter “the Strategy”), which was adopted by Law No. 47/2025, dated July 3, 2025.

The Strategy aims to establish a coordinated institutional framework for identifying, preventing, and addressing malicious foreign interference in the information space, including disinformation and other forms of information manipulation. More broadly, it seeks to safeguard national interests and strengthen the resilience of democratic processes against these threats.

The Strategy has four main objectives addressing different dimensions of the phenomenon:

OBJECTIVE I focuses on strengthening institutional capacities to prevent, detect, and analyze foreign interference in electoral processes. It includes improving the legal framework and election monitoring mechanisms, increasing transparency and oversight of political financing, and strengthening accountability and coordination between public institutions and private actors to prevent foreign interference.

OBJECTIVE II aims to strengthen national security by enhancing capacities for early detection, identification, and response to hybrid foreign interference. It includes improving interinstitutional coordination, protecting critical infrastructure, developing strategic communication with the public, strengthening cyber capacities, and expanding cooperation with the private sector and international partners, particularly NATO and the European Union.

OBJECTIVE III seeks to protect the national economy and strategic sectors from foreign interference by strengthening enforcement mechanisms for monitoring and controlling capital within the economy. It also includes addressing threats to critical sectors and the financial system, with the aim of preserving economic stability and preventing malicious influence.

OBJECTIVE IV foresees the protection and strengthening of freedom of expression and the media, as well as raising public awareness in response to disinformation. It includes developing the capacities of independent media and supporting civil society organizations, promoting reliable information, and enhancing media literacy and citizens' digital skills to strengthen societal resilience against disinformation.

2. PURPOSE AND MONITORING METHODOLOGY

2.1 Scope of assessment

2.2 Methodological approach to monitoring

**2.3 Data sources and classification of
implementation progress**

2.1 Scope of assessment

This report focuses on assessing the implementation of Objective I and Objective IV of the Strategy during the first six months of its implementation. In particular, the analysis examines the progress made in strengthening the integrity of electoral processes, transparency of political financing, and institutional coordination for preventing foreign interference, as well as measures supporting media freedom, increasing public awareness, and strengthening societal resilience to disinformation. Objectives II and III are addressed in a separate monitoring report, which analyses the national security dimension and the protection of the economy and critical sectors from foreign interference.

The assessment focuses on initial institutional steps and progress in establishing implementation mechanisms and does not aim to measure the long-term impact of the Strategy on the information environment or on democratic resilience.

The purpose of this report is to provide an assessment of progress in implementing the measures envisaged in the Strategy, as well as to analyse the level of development of the institutional infrastructure required for their implementation during the first six months following the adoption of the law.

The report evaluates the implementation of 28 measures envisaged under two (out of four) objectives of the Strategy:

- Objective I: Establishment and consolidation of institutional capacities to prevent, detect, and analyse foreign interference in electoral campaigns
- Objective IV: Protection and strengthening of freedom of expression and media freedom, as well as increasing citizens' awareness and capacities to identify and resist disinformation

Although most measures have implementation timelines extending until 2030, this early monitoring exercise aims to provide an initial overview of the situation, identify potential challenges, and establish the basis for subsequent monitoring phases, when the level of implementation is expected to be more advanced and accompanied by measurable results.

2.2 Methodological approach to monitoring

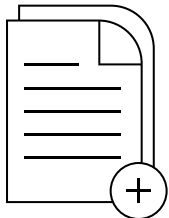
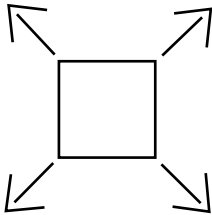
The monitoring was based on a structured approach grounded in the typology of measures set out in the Strategy and on indicators adapted to assess institutional progress for each of them.

For the purpose of the monitoring exercise, a set of specific indicators (see Table 1) was developed for each measure envisaged in the Strategy, tailored to its typology and to the competences of the institutions responsible for implementation.

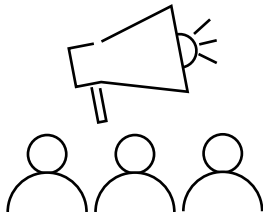
The typology of monitored measures was categorised as follows:

- drafting or revision of primary and secondary legislation;
- strengthening institutional capacities through training, procedures, and administrative resources;
- development of public awareness campaigns;
- integration of information and communication technology (ICT) systems and equipment into institutional work processes;
- strategic and operational measures;
- institutional measures.

Table 1: Indicators by typology of measures under the Strategy

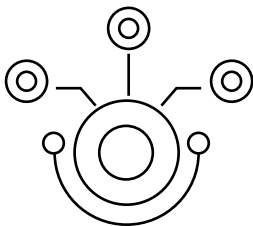
| Measures | Key Indicators |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Drafting/Revision of Primary or Secondary Legislation</p>  | <ul style="list-style-type: none"> • Transparency of the drafting/revision process • Inclusion of societal actors and stakeholder groups in public consultations • Compliance with international standards with which alignment is intended • Entry into force of the relevant provisions |
| <p>Strengthening Institutional Capacities</p>  | <ul style="list-style-type: none"> • Development of curricula and specific training plans • Practical implementation of curricula and specific training plans • Sustainability of capacity building (integration of curricula into continuous training) • Integration of new skills into job descriptions and performance evaluation systems |

Public Campaigns



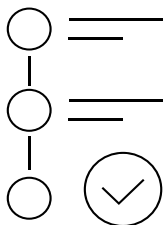
- Reach of the campaign and inclusion of the target audience
- Level of audience engagement
- Analysis to measure effectiveness and impact

Integration of Electronic Systems / ICT



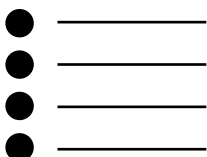
- Transparency of system design and establishment procedures
- Approval of plans for the implementation of ICT systems
- Actual implementation and operationalization of ICT systems
- Accessibility and usability for users

Strategies / Operational Measures



- Transparency of the drafting/revision process
- Inclusion of societal actors and stakeholder groups in public consultations
- Compliance with international standards with which alignment is intended
- Entry into force of the relevant provisions

Institutional Measures



- Official status of the establishment of institutional mechanisms (legal acts, decisions, administrative acts)
- Operational capacity (staff recruitment, budget allocation)
- Effective functioning of new mechanisms or institutions

2.3 Data sources and classification of implementation progress

The data collection and analysis process was based on a combination of the review of official documents and access to information requests addressed to the institutions responsible for implementing the measures of the Strategy.

The data collection process included a literature review and the submission of 31 access to information requests to the responsible institutions, of which responses were received from 19 institutions.

The Prime Minister's Office did not respond to the access to information request even after an appeal to the Commissioner for the Right to Information and Protection of Personal Data, while the Ministry of Defence and the State Intelligence Service informed that the requested information was classified. These limitations affected the level of detail of the information available for some measures of the Strategy and were taken into account in interpreting their implementation status.

Among the institutions that responded to the requests for information, some provided general information on activities undertaken or planned and on their role in implementing the Strategy, while others submitted more detailed supporting documentation, such as work plans, institutional strategies, orders establishing relevant working groups, audit reports, and certifications related to information security management.

The data collected through the literature review and the access to information requests were analysed with the aim of assessing the implementation status of each measure, in accordance with the defined indicators.

Taking into account the early stage of implementation of the Strategy, the assessment of measures was divided into three categories:

- measure for which implementation has not started / no information available;
- measure for which planning has started or implementation is in early stages;
- measure implemented.

3. ASSESSMENT OF THE IMPLEMENTATION OF OBJECTIVES I AND IV OF THE STRATEGY

- 3.1 Framework of measures envisaged under Objectives I and IV
- 3.2 Responsible institutions for implementation and coordination
- 3.3 Initial progress in the implementation of measures
- 3.4 Monitoring findings by measures

This chapter presents an assessment of the initial progress in the implementation of the measures envisaged under Objective I and Objective IV of the National Strategy against Foreign Interference and Disinformation 2025–2030, which relate respectively to strengthening institutional capacities for preventing and addressing foreign interference in electoral processes and to increasing the resilience of the media and society to disinformation. The assessment covers the period July 2025 – early January 2026 and is based on the analysis of publicly available institutional documents, information provided by the responsible institutions, as well as the review of concrete steps undertaken during the initial stages of implementation of the respective measures.

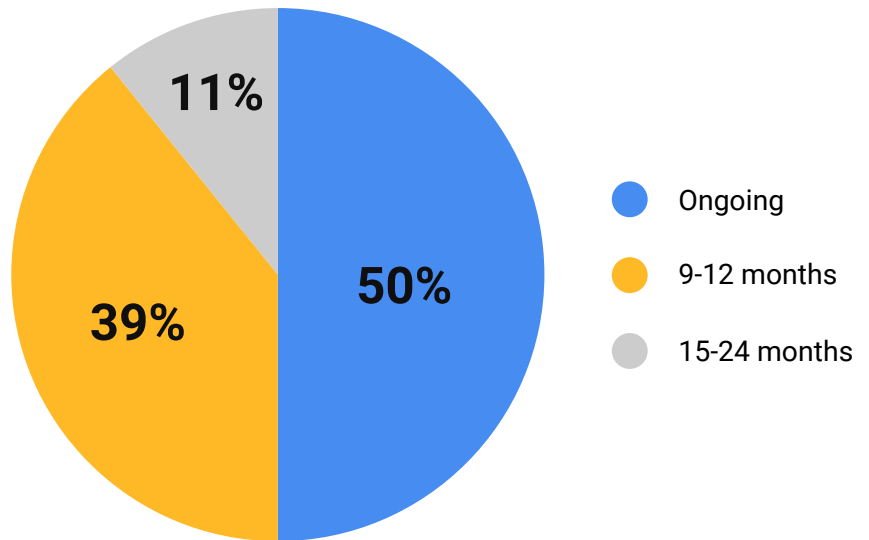
The chapter then presents, in a structured manner, the implementation status according to objectives, typology of measures, and responsible institutions, highlighting the progress achieved, the challenges encountered, and the main gaps identified during the monitoring period.

3.1 Framework of measures envisaged under Objectives I and IV

This section presents an analysis of the framework of measures envisaged under Objectives I and IV of the Strategy, which relate respectively to strengthening the integrity of electoral processes and increasing the resilience of the media and society to foreign interference and disinformation. The analysis of the structure of these measures according to timelines, typology, and areas of intervention serves as a basis for assessing the initial progress in their implementation and for identifying institutional factors affecting the feasibility of the Strategy at this early stage of implementation.

Objectives I and IV of the Strategy include a total of 28 measures, specifically 19 measures under Objective I and 9 measures under Objective IV. Half of these measures (14 out of 28) do not have clearly defined implementation deadlines and are referred to as “ongoing measures”, while only 11 measures provide for early implementation timelines (9–12 months). The timelines for the remaining measures range between 15 and 24 months (see Figure 1). This distribution of timelines indicates that a significant proportion of the measures have been designed as continuous institutional processes rather than as interventions expected to produce immediate results, which makes early monitoring of institutional progress and implementation mechanisms particularly important.

Figure 1: Number of measures by implementation timelines



In terms of typology, the measures envisaged under these two objectives include changes to primary and secondary legislation (9 measures), strategic and operational measures (5 measures), capacity-building and human resources measures (11 measures), public awareness campaigns (3 measures), ICT equipment (3 measures), and institutional measures (4 measures) (see Figure 2). This distribution reflects a combination of normative, organisational, and awareness-raising interventions, aimed at addressing both the institutional dimension of protecting electoral processes and the societal dimension of resilience to disinformation.

Figure 2: Number of measures by typology

| | | | |
|---------------------------------------------------|--------------------------------------|-----------------------------------|---------------------|
| Capacity-building/ human resources measures | Primary and secondary legislation | Strategic/operational measures | Public campaigns |
| | | Institutional measures | ICT equipment |
| 11 | 9 | 5 | 3 |
| | | 4 | 3 |

The 19 measures envisaged under *Objective I: “Establishing and consolidating institutional capacities to prevent, detect and analyse foreign interference in electoral campaigns”* focus on strengthening the legal safeguards and monitoring mechanisms of electoral processes, with the aim of preventing and addressing foreign interference.

These measures include the revision and improvement of primary and secondary legislation governing electoral processes, the establishment of a unit for monitoring disinformation, the development of contingency plans against cyberattacks, strengthening the security of electoral ICT systems, the creation of digital platforms to improve transparency of political financing, and the regulation of foreign interference through lobbying activities and transparency requirements for political advertising on social media during electoral campaigns. This objective also envisages measures to strengthen financial oversight, regulate the activities of third parties during electoral campaigns, and enhance international coordination for information-sharing on hybrid threats. A significant part of the measures is also related to strengthening institutional capacities, including training for the electoral administration and the development of awareness-raising activities targeting both the public and educational institutions.

By contrast, the 9 measures envisaged under *Objective IV: “Protecting and strengthening freedom of expression and the media, and increasing awareness against disinformation”* aim to strengthen freedom of expression and media freedom, as well as to enhance citizens’ ability to identify and resist disinformation through media and digital literacy.

These measures include the establishment of cooperation mechanisms between state institutions and civil society organisations for analysing and monitoring foreign interference, their support through public funding, the promotion of fact-checking journalism, and the development of training programmes for journalists and public oversight bodies on digital security. They also foresee public awareness campaigns, as well as the integration of Media and Information Literacy (MIL) and digital skills into school and university curricula. Taken together, the measures envisaged under Objectives I and IV address both the institutional and societal dimensions of resilience to foreign interference and disinformation, combining the protection of electoral processes with the strengthening of the media sector and public awareness.

3.2 Responsible institutions for implementation and coordination

This section analyses the institutional framework responsible for the implementation and coordination of the Strategy under Objectives I and IV, as well as the impact that existing coordination mechanisms have had on the initial progress in implementing the envisaged measures.

The Ad Hoc Parliamentary Committee “To coordinate and oversee all institutional actions to combat disinformation and other forms of foreign interference in the country’s democratic processes” exercised its mandate until the end of the 10th Legislature of the Assembly of Albania. The mandate of this committee concluded with the review and adoption of Law No. 47/2025 “On the adoption of the National Strategy against Foreign Interference and Disinformation 2025–2030.”

In the new and current legislature of the Assembly of Albania, the establishment of a dedicated committee on malign foreign interference and disinformation has not been envisaged. As a result, an institutional gap has emerged in terms of parliamentary oversight, creating uncertainty regarding the parliamentary structures responsible for exercising the monitoring function.

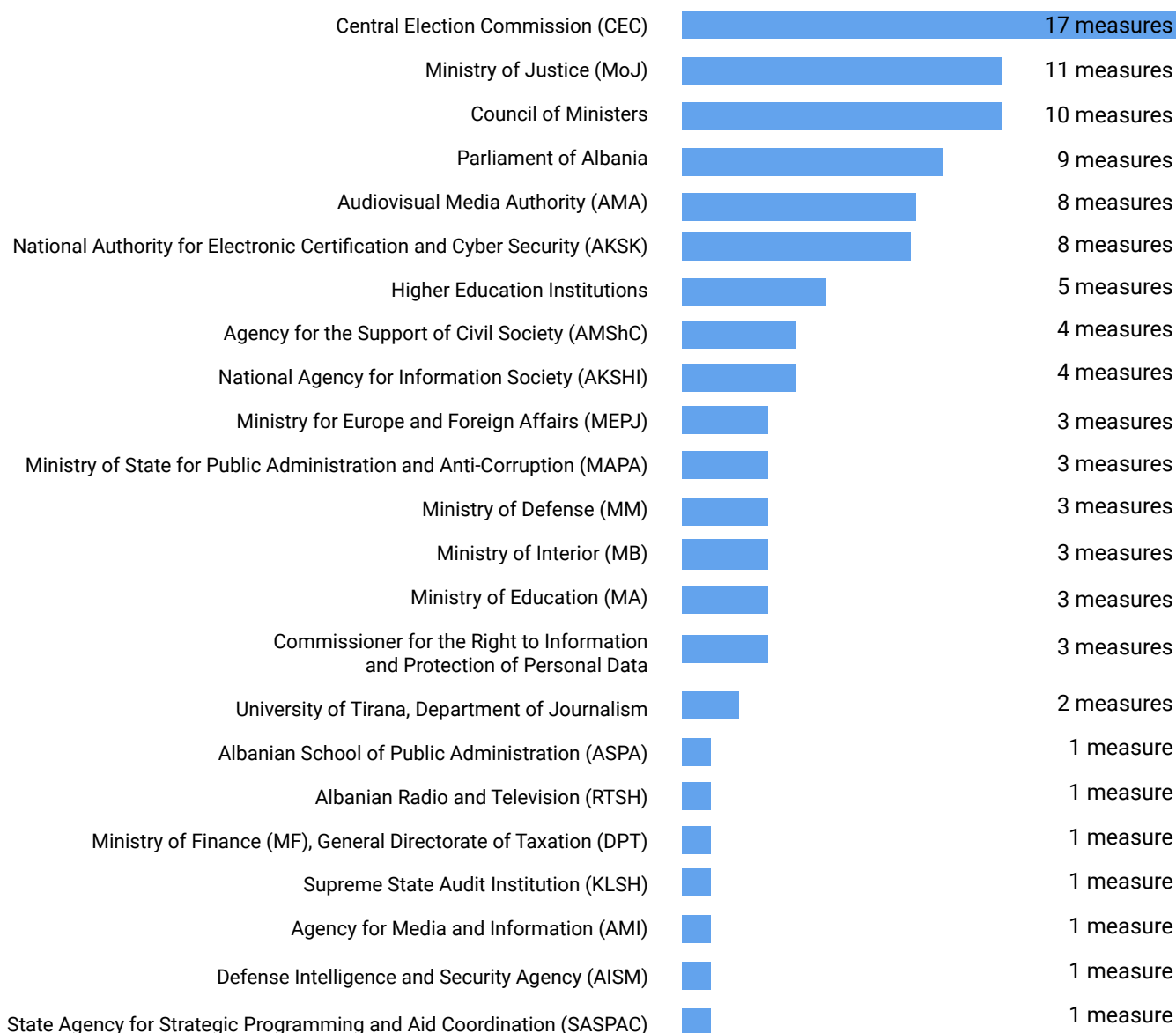
The Strategy assigns the Council of Ministers responsibility for drafting and approving the Action Plan for the implementation of the Strategy within 2025, including ensuring budgetary support for the envisaged measures and investments. The Strategy also assigns the Assembly of Albania and the Council of Ministers responsibility for establishing a dedicated structure for identifying and responding to malign foreign interference and disinformation. This structure is also entrusted with direct responsibilities for implementing a significant number of measures under the Strategy (primarily under Objectives II and III).

However, at the time of publication of this report, the Action Plan has not been adopted, and the responsible structure has not yet been established or designated. The absence of the Action Plan has delayed the initiation of implementation activities for at least part of the responsible institutions and represents one of the main factors affecting the limited level of implementation progress during the monitoring period.

The absence of clear oversight mechanisms and delays in establishing the responsible structures risk weakening the implementation of the Strategy. Without unified coordination and clearly defined responsibilities, there is an increased risk of institutional fragmentation and limited parliamentary and executive oversight.

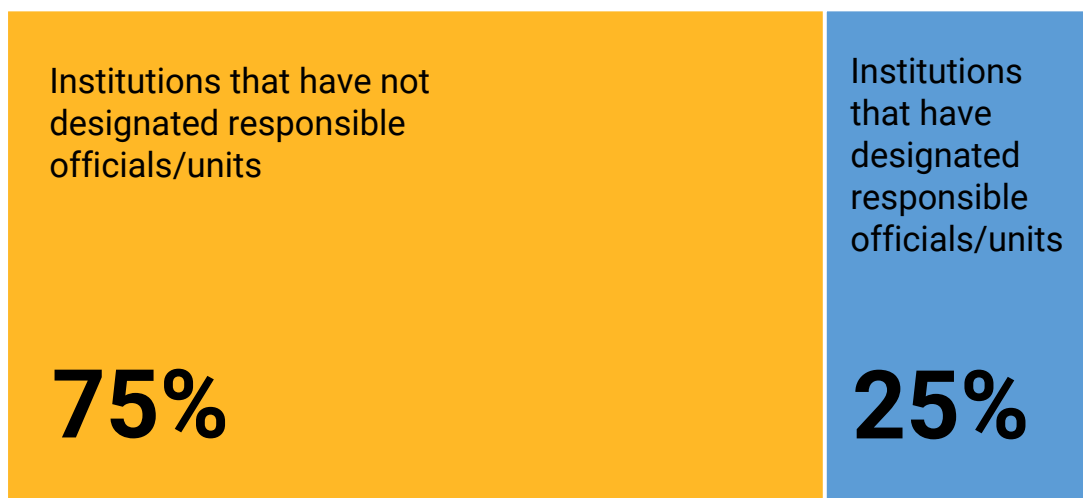
For the implementation of each measure, the Strategy designates a range of responsible institutions, including the Assembly, the Council of Ministers, line ministries, government agencies and institutions under central government authority, as well as several independent institutions and universities. As shown in Figure 3 below, 24 institutions are involved in implementing measures related to Objective I and Objective IV.

Figure 3: Institutions according to the number of measures for which they are responsible



Responses provided to the requests for information indicate that only 6 out of the 24 institutions have designated units or officials responsible for the implementation of the Strategy. Specifically, in the case of the Central Election Commission (CEC), responsibility lies with the Chief Information Security Officer; at the Agency for the Support of Civil Society (AMShC), a three-member working group has been established for the implementation of the Strategy; at the Media and Information Agency (AMI), responsibility lies with the Directorate for Institutional Communication, Research and Content; at the Ministry for Europe and Foreign Affairs (MEPJ), with the Sector for Security and Cyber Diplomacy Issues within the Directorate for NATO and Security Affairs; at the Ministry of Justice (MoJ), with the Directorate of Policies and Strategies in the Field of Justice; and at the Commissioner for the Right to Information and Personal Data Protection IDP Commissioner, with the Directorate for Legal Affairs and External Relations. Other institutions did not report designated responsible units or had not yet initiated implementation of the Strategy.

Figure 4: Designation of responsible officials/units for the implementation of the Strategy



However, beyond the formal designation of responsible structures, the responses provided by several institutions raise questions regarding their approach to the implementation of the Strategy. The Ministry of Justice, although involved in 11 measures under Objectives I and IV, emphasised that it does not have a leading role or legislative initiative related to the implementation of the Strategy, according to the legal framework defining its field of responsibility.

Similarly, according to State Agency for Strategic Programming and Aid Coordination (SASPAC), the measures of the Strategy assigned to the institution do not fall within its legally defined mandate.

Comparable concerns were also raised by the National Agency for Information Society (AKSHI). The institution argued that the absence of a decision of the Council of Ministers approving the Action Plan prevents the initiation of implementation activities. At the same time, the institution stressed that it cannot engage in matters related to electoral processes or electoral technologies, which fall under the responsibility of the CEC as an independent institution, since such involvement would exceed its mandate. This situation may call into question the feasibility of implementing the joint measures envisaged between AKSHI and the CEC.

By contrast, institutions such as the National Cyber Security Authority (AKSK), the Audiovisual Media Authority (AMA), the CEC, the Media and Information Agency (AMI) (although responsible for only one measure), and the AMShC reported having taken concrete steps towards implementation, including the preparation of work plans, the allocation of financial resources, the designation of responsible persons, and the organisation of initial implementation activities. For these institutions, the Strategy appears to have been interpreted as an operational and implementable document, even in the absence of an Action Plan approved by the Council of Ministers.

The differences observed in institutional approaches to the implementation of the Strategy—from interpreting it as an operational document to treating it as a formal or conditional commitment—risk directly affecting its feasibility and effectiveness and point to the absence of a unified operational framework for interinstitutional implementation.

At the same time, the large number of institutions involved (24) and the complexity of the policy field—which combines cybersecurity, electoral processes, media literacy, data protection, diplomacy, and public administration—require full clarity in the division of tasks, responsibilities, and mechanisms for interinstitutional cooperation.

In addition to their number, the institutions involved differ significantly in nature (including executive branch institutions and central administration bodies, constitutionally independent institutions, regulatory authorities, and educational institutions, among others), further increasing the need for structured coordination and clearly defined institutional roles.

Without clear alignment between the measures envisaged in the Strategy and the legal mandates of each institution, there is an increased risk that responsibilities may remain fragmented, overlapping, or insufficiently addressed.

In this context, the Action Plan (which had not yet been adopted at the time of publication) appears as a key instrument for addressing these challenges. Its absence so far appears to have created institutional uncertainty, differing interpretations by institutions regarding their roles and responsibilities, and delays in the initiation of the implementation of several measures. According to the law approving the Strategy, the Action Plan was required to be adopted within 2025.

3.3 Initial progress in the implementation of measures

The analysis of data relating to the 28 measures envisaged under Objectives I and IV (see Tables 1 and 2) shows that implementation has not yet begun for the majority of measures. Specifically, for 18 measures, representing 64% of the total, no implementation progress has been identified or there is insufficient information available to assess their status. Meanwhile, 10 measures (36%) are in early planning or initial stages of implementation, while no measure had been fully implemented at the time of monitoring (see Figure 5).




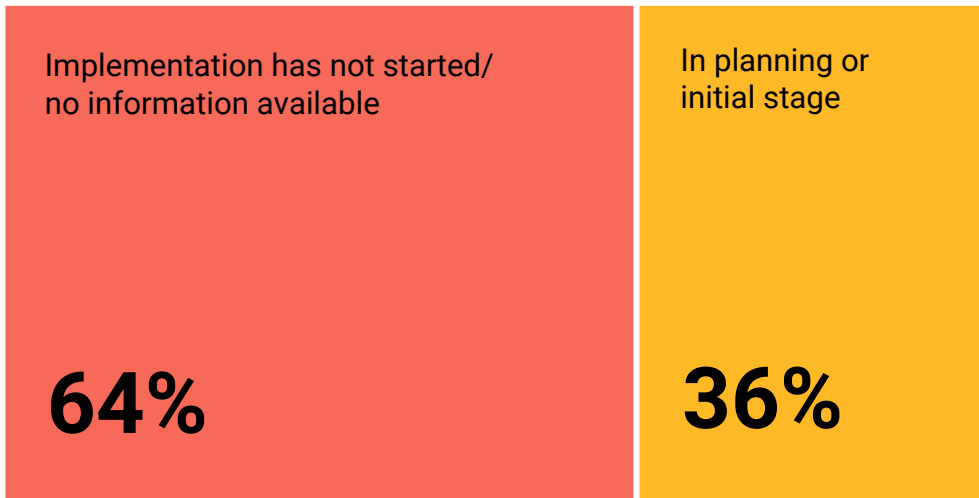
-  → Implementation not initiated / no information available (18 of 28, or 64%)
-  → Planning or early-stage implementation (10 of 28, or 36%)
-  → Implemented (0 of 28)

Figure 5: Distribution of measures by implementation status



Most of the measures for which planning or early-stage implementation has begun relate to strengthening institutional capacities, interinstitutional cooperation, and operational measures aimed at increasing resilience to foreign interference and disinformation.

At the same time, the distribution of implementation progress across responsible institutions shows that only a limited number of institutions have initiated planning or implementation of the measures assigned to them under the Strategy (Figure 6). Specifically, approximately 29% of institutions have taken initial steps toward implementation, while no measurable progress was identified for approximately 71% of institutions during the monitoring period. This distribution reflects the cross-sectoral nature of the Strategy and the extent to which its implementation depends on interinstitutional coordination mechanisms that remain at an early stage of development.

Figure 6: Implementation progress by responsible institutions

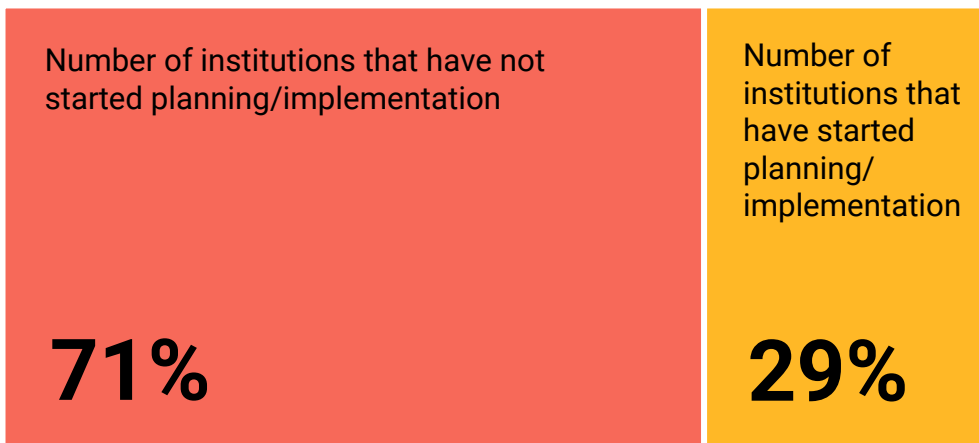
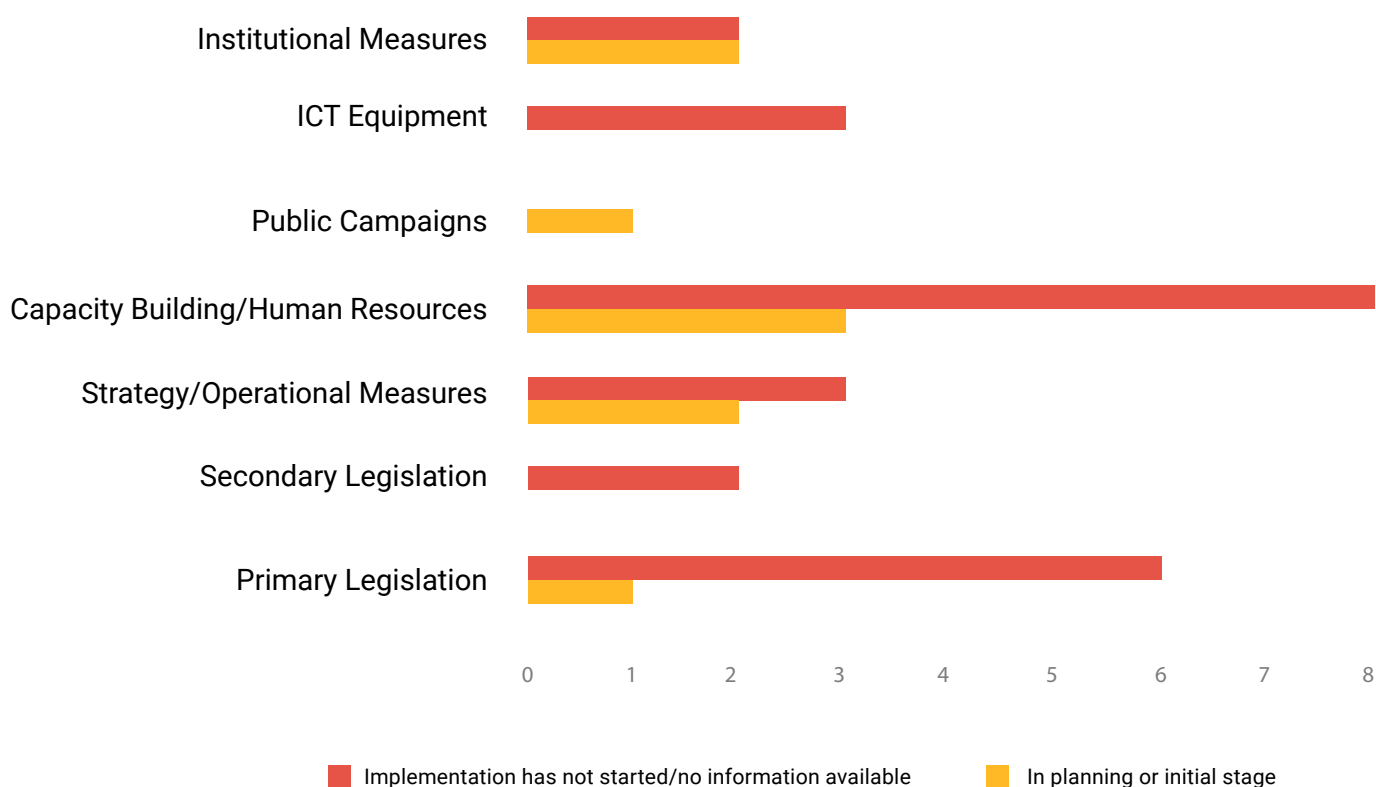


Figure 7 shows that initial implementation progress has been concentrated mainly in measures related to strengthening institutional capacities and human resources, as well as strategic and operational measures, whereas measures requiring changes to primary and secondary legislation, the establishment of new digital infrastructures, and the creation of new institutional mechanisms remain largely unimplemented. This distribution confirms that interventions requiring interinstitutional coordination and longer decision-making processes typically progress more slowly during the early stages of Strategy implementation.

Figure 7: Implementation status by typology of measure



Initial progress in measures related to the integrity of electoral processes

In the area of protecting electoral processes and strengthening institutional capacities against foreign interference, several institutions have taken concrete steps toward implementing the measures envisaged under the Strategy, particularly with regard to strengthening the security of electoral systems, enhancing interinstitutional cooperation, and improving international coordination to address hybrid threats.

Within the framework of **Measure 1.1** on strengthening legal safeguards and monitoring mechanisms for electoral processes, the Central Election Commission (CEC) has adopted strategic documents on information security management, as well as incident response and recovery protocols. In addition, security audits and penetration testing (audit–pentest) have been carried out for the information and communication technology (ICT) systems used in electoral processes, representing important steps toward strengthening the technical security of the electoral infrastructure.

Under **Measure 1.3**, which concerns strengthening accountability and coordination between public and private actors to prevent foreign interference, the AKSK has prepared and adopted the National Cybersecurity Strategy 2025–2030, which also addresses hybrid threats and institutional coordination for their prevention, detection, and response.

At the level of international cooperation, and within the framework of **Measure 1.3.4** concerning engagement with international structures and centres of expertise on foreign interference, the MEFA has taken steps to strengthen coordination with international partners, particularly NATO and the European Union. Examples of such cooperation include engagement with the European Centre of Excellence for Countering Hybrid Threats (Hybrid CoE), as well as participation in NATO mechanisms and working groups addressing disinformation, such as the NATO Rapid Response Group (NRRG). The Media and Information Agency (AMI) also reported its participation in NATO cooperation mechanisms such as the NRRG and the NRRG Signal Group.

In addition, within the framework of measures related to personal data protection in the context of electoral security, the Commissioner for the Right to Information and Personal Data Protection adopted 10 secondary acts for the implementation of Law No. 124/2024 “On Personal Data Protection”, in line with the requirements of **Measure 1.4.2** on improving regulations related to personal data protection.

However, beyond these initial steps in strengthening institutional security and international coordination, a number of measures directly related to the transparency of political financing and the oversight of electoral campaigns remain unimplemented, representing one of the main gaps in the framework for electoral integrity.

In this context, the inclusion of political finance transparency, the regulation of the role of third parties, and the oversight of political advertising on social media in the [working agenda](#) of the Electoral Reform Commission represents a positive development, creating a concrete opportunity to align the electoral legal framework with the measures envisaged in the Strategy and to address gaps identified during the monitoring of the 2025 parliamentary elections.

Initial progress in measures related to media, media literacy, and public awareness

Compared to measures related to the reform of the electoral legal framework and the transparency of political financing, a number of measures envisaged under Objective IV that relate to media literacy and public awareness are in the early stages of implementation, primarily through institutional activities of an informational, supportive, and awareness-raising nature.

In this context, the Agency for the Support of Civil Society (AMShC) has prepared an institutional implementation plan for the Strategy, which provides for financial support to civil society organisations working in the field of countering disinformation. According to the institution's planning framework, approximately 10% of the budget allocated to its public calls for proposals will be dedicated to projects related to this field, in line with **Measure 4.1.2** of the Strategy.

In the area of education and public awareness, the Ministry of Education and Sports has taken steps toward the gradual integration of Media and Information Literacy (MIL) and digital skills into school curricula, in line with the requirements of **Measure 4.2.2**. These interventions represent initial steps toward the institutionalisation of media literacy within the education system, although their full implementation requires further development of teaching modules, teacher training, and interinstitutional coordination for the systematic integration of MIL competencies across all levels of pre-university education.

At the same time, the Audiovisual Media Authority (AMA) has undertaken a range of informational and awareness-raising activities aimed at strengthening media literacy and promoting the responsible use of audiovisual media and digital platforms, mainly in relation to **Measures 4.2.1 and 4.2.3** under Objective IV of the Strategy. In particular, AMA has published informational and guidance materials for the public on phenomena such as disinformation, online manipulation, hate speech, and challenges related to developments in artificial intelligence, as part of its mandate to promote reliable information and protect the public from harmful content in the audiovisual space.

According to AMA's institutional reporting for the period July 2025 – January 2026, additional public communication and awareness-raising activities were carried out to increase awareness of online safety, critical media use, and the identification of manipulative content, alongside the continuation of audiovisual content monitoring activities related to hate speech and broadcasting ethics standards, in line with **Measure 4.1.4** of the Strategy. These interventions represent initial steps toward promoting reliable information and strengthening public resilience to disinformation, although the establishment of sustainable and structured interinstitutional mechanisms to address disinformation, in line with **Measure 4.1.1**, remains at an early stage of development.

However, despite these initial steps, several measures envisaged under Objective IV related to the establishment of sustainable interinstitutional cooperation mechanisms, the systematic support of fact-checking journalism, and the development of structured national media literacy programmes remain at early planning stages and require broader institutional coordination and dedicated resources for their full implementation.

Measures for which implementation has not yet begun

Most of the measures for which implementation has not yet begun relate to changes to primary and secondary electoral legislation, the strengthening of political finance transparency, and the establishment of new institutional mechanisms for monitoring and responding to foreign interference and disinformation.

The unimplemented legislative measures mainly concern the regulation of political financing and transparency during electoral campaigns, including amendments to the electoral legal framework to prevent financing from suspicious sources and to address “shadow campaigns,” as well as the adoption of clear provisions prohibiting and monitoring foreign funding of political parties and electoral candidates.

In particular, **Measure 1.2.2**, which envisages the creation of a digital platform for real-time registration of political parties’ financial resources and expenditures, has not been implemented as foreseen by the Strategy. Although the Central Election Commission (CEC) operates an existing financial reporting platform, it was not upgraded in time for the submission of campaign finance reports for the 11 May 2025 parliamentary elections, resulting in usability challenges for reporting entities and [limitations in the transparency](#) of data available to the public and the media.

Similar findings were identified through the independent analysis of electoral subjects’ financial reports, which highlighted structural shortcomings in existing financial oversight mechanisms and emphasised the importance of implementing **Measure 1.2.5**, aimed at strengthening the capacities of the Central Election Commission and reviewing mechanisms for monitoring political party finances. These shortcomings were particularly evident in the reporting and monitoring of campaign expenditures on social media, issues that are directly linked to **Measure 1.3.2** concerning the establishment of clear rules for [financial transparency of online political advertising](#) during electoral campaigns.

Likewise, implementation has not yet begun for measures related to the registration and disclosure of financial resources and links with third parties during electoral campaigns, as well as the creation of publicly accessible databases for the relevant declarations, which represent essential elements for increasing transparency and identifying possible foreign interference in electoral processes.

Among the legislative measures envisaged for regulating lobbying activities, although a relevant law was adopted in January 2026, it does not address foreign interference in line with the requirements of the Strategy and has therefore been assessed as not implemented within the framework of its objectives.

Implementation has also not yet begun for measures related to the establishment of a national register for transparency of lobbying activities and integrated platforms for the real-time publication of data on political financing and third-party activities, which are intended to increase transparency and traceability of influence in electoral processes.

Among the unimplemented institutional measures are the establishment of a dedicated unit for monitoring disinformation and responding to it in real time, as well as the creation of structured cooperation mechanisms between responsible institutions and civil society organisations for addressing foreign information interference.

In addition, several important capacity-building measures related to the media sector and public administration have not yet begun implementation, including the development of structured training programmes for journalists and public oversight bodies on digital security and the identification of disinformation, the organisation of training for the electoral administration on the risks posed by hybrid interference in electoral processes, and the integration of mandatory training modules on media literacy and digital security into the programmes of the Albanian School of Public Administration (ASPA).

Overall, the lack of progress on these measures reflects the fact that a significant portion of the interventions envisaged by the Strategy require coordinated legal and institutional changes, as well as dedicated human and technical resources, which typically require longer timeframes to plan and implement. Nevertheless, these measures remain essential for strengthening the integrity of electoral processes and enhancing institutional and societal resilience to foreign interference and disinformation.

3.4 Monitoring findings by measures

The following section presents, in a structured manner, the main monitoring findings regarding the implementation status of the measures envisaged under Objectives I and IV of the Strategy, organised by areas of intervention and responsible institutions. The tables synthesise the assessment of the level of progress for each individual measure, based on the analysis of institutional documents, publicly available information, and communication with the responsible institutions during the period July 2025 – January 2026.

The implementation status is presented through a colour-coded classification system, distinguishing between measures for which no implementation progress has been identified or insufficient information is available for assessment, measures that are in planning or early stages of implementation, and measures for which more advanced progress has been identified. This presentation aims to provide a clear comparative overview of the current level of Strategy implementation and to identify priority areas requiring further institutional action.

Table 2 presents the implementation status of the measures envisaged under Objective I, related to the establishment and consolidation of institutional capacities to prevent, detect, and analyse foreign interference in electoral campaigns, while Table 3 presents the status of the measures envisaged under Objective IV, related to strengthening the resilience of the media and society to disinformation and foreign information interference.

Table 2: Implementation status of measures under Objective I: “Establishment and Consolidation of Institutional Capacities to Prevent, Detect and Analyse Foreign Interference in Electoral Campaigns”

| Field | Measure | Deadline | Responsible Institutions | Type of Measure | Implementation Status |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------|------------------------------------|
| 1.1 Strengthening legal protection and monitoring mechanisms of electoral processes | 1.1.1 Revision and improvement of the legal framework | 15 months | Assembly of the Republic of Albania, Central Election Commission, Ministry of Justice | Primary legislation | Red |
| | | | | Secondary legislation | Red |
| | 1.1.2 Regulatory framework for preliminary assessment and auditing of ICT systems in electoral processes. Audit and certification of voter databases and electoral equipment Auditimi dhe certifikimi i databazave të zgjedhësve dhe pajisjeve zgjedhore. | 15 months | Central Election Commission, Ministry of Interior, AKSK, AKSHI, Supreme State Audit | Primary legislation | Red |
| | | | | Strategic-operational measures | Yellow |
| | | | | Strategic-operational measures | Red |
| | 1.1.3 Drafting an emergency response plan for cyberattacks | 12 months | CEC, Ministry of Defense, Ministry of Interior, AISM, State Intelligence Service, AKSK, AKSHI, Commissioner for Data Protection | Strategic-operational measures | Red |
| | | | | Ongoing | Capacity building/ human resources |

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|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-----------|------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| 1.2 Increasing transparency and establishing mechanisms for oversight of political financing | 1.2.1 Drafting legislation to prohibit foreign funding | 12 months | Assembly, Council of Ministers, Ministry of Justice, CEC | Primary legislation | |
| | 1.2.2 Creation of a digital platform for financial transparency | 12 months | CEC, Ministry of Justice | ICT Equipment | |
| | 1.2.3 Adoption of the regulatory framework for lobbying activities | 24 months | Council of Ministers, Ministry of Justice, MAPA, CEC | Primary legislation | |
| | 1.2.4. Establishment of a national register for the transparency of lobbying activities | 24 months | Council of Ministers, Ministry of Justice, MAPA, Central Election Commission | ICT Equipment | |
| | 1.2.5 Strengthening financial oversight | Ongoing | Parliament, Council of Ministers, Ministry of Justice, Central Election Commission | Capacity building/ human resources | |
| | 1.2.6 Engagement in international programs in the field of security of electoral processes | Ongoing | Ministry for Europe and Foreign Affairs, AKSHI, AKSK, Central Election Commission | Capacity building/ human resources | |
| | 1.2.7 Regulating the activities of third parties in electoral campaigns | | 12 months | Parliament, Ministry of Justice, Central Election Commission, Commissioner for the Right to Information and Protection of Personal Data | Secondary legislation |
| ICT Equipment | | | | | |

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|------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|--|
| 1.3 Strengthening accountability and coordination between public and private actors to prevent foreign interference | 1.3.1 Establishment of a dedicated unit for monitoring disinformation | 12 months | Parliament, the responsible Parliamentary Committee, the Central Election Commission, the Ministry of Justice | Institutional Measures | |
| | 1.3.2 Regulations on the financial transparency of political advertising on social media during the electoral campaign | 12 months | Ministry of Justice, Central Election Commission, Audiovisual Media Authority | Primary legislation | |
| | 1.3.3 International coordination for the exchange of information on hybrid threats and/or foreign interference | Ongoing | Ministry for Europe and Foreign Affairs (MEPJ), Ministry of Defense (MM), National Agency for Information Society (AKSHI), National Authority for Electronic Certification and Cyber Security (AKSK), etc. | Institutional Measures | |
| | 1.3.4 Interaction with international structures and centers of expertise on foreign interference | Ongoing | Ministry for Europe and Foreign Affairs (MEPJ), Ministry of Defense (MM), Central Election Commission (CEC) | Institutional Measures | |

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|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|--|
| 1.4 Sanctioning foreign interference and strengthening the legal framework | 1.4.1 A regulatory framework for illicit financing and foreign interference in electoral processes | 12 months | Parliament, Ministry of Justice, Central Election Commission, National Authority for Electronic Certification and Cyber Security | Primary legislation | |
| | 1.4.2 Improving regulations for the protection of personal data | 9 months | Commissioner for the Right to Information and Protection of Personal Data (KDIMDHP), Ministry of Justice (MD), Ministry of Defense (MB), Central Election Commission (CEC), National Authority for Electronic Certification and Cyber Security (AKSK) | Primary legislation | |

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|--------------------------------------------------------------------|------------------------------------------------------------------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|--|
| 1.5 Building institutional capacities and raising public awareness | 1.5.1 Organization of trainings for the electoral administration | 12 months | Central Election Commission, newly established institutions in the field | Capacity building/ human resources | |
| | | Ongoing | | Capacity building/ human resources | |
| | 1.5.2 Public awareness campaigns for citizens | Ongoing | Central Election Commission (CEC), Agency for Media and Information (AMShC), Special Anti-Corruption and Organized Crime Structure (SPAK), Civil Society Organizations (CSOs), newly established institutions in the field | Public campaigns | |
| | 1.5.3 Awareness campaigns with higher education institutions | Ongoing | Ministry of Education, universities, newly established institutions in the field | Public campaigns | |
| | | | | | |

Table 3: Implementation status of measures under Objective IV: “Protection and Strengthening of Freedom of Expression and Media Freedom, and Increasing Public Awareness and Engagement against Disinformation”

| Field | Measure | Deadline | Responsible Institutions | Type of Measure | Implementation Status |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-----------------------|
| 4.1 Development of the capacities of civil society organizations and independent media to combat disinformation | 4.1.1 Establishment of structured cooperation mechanisms between institutions dealing with FIMI and NGOs, enabling the analysis and monitoring of foreign interference | 12 months | Parliament, Council of Ministers, Agency for Media and Information (AMShC), responsible structures | Institutional Measures | |
| | 4.1.2 Provision of public funding to support programs and capacity-building for NGOs to develop expertise in the research, analysis, and detection of FIMI, as well as in advocacy and awareness-raising | Ongoing | Parliament, Council of Ministers, Agency for Media and Information (AMShC), Audiovisual Media Authority (AMA), Agency for Information and Media (AMI) | Capacity building/ human resources | |
| | 4.1.3 Promotion of fact-checking journalism in public media broadcasts (RTSH) and international media | Ongoing | Parliament, Audiovisual Media Authority (AMA), Albanian Radio and Television (RTSH) | Capacity building/ human resources | |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|--|
| 4.1 Development of the capacities of civil society organizations and independent media to combat disinformation | 4.1.4 Development of training programs and support mechanisms for journalists, media, and public oversight bodies on digital security | Ongoing | Council of Ministers, Audiovisual Media Authority (AMA), National Authority for Electronic Certification and Cyber Security (AKSK), Agency for Media and Information (AMShC), Department of Journalism, Higher Education Institutions | Capacity building/ human resources | |
| | 4.1.5 Provision of fiscal incentives for investigative journalism to strengthen media pluralism and combat disinformation supported by foreign actors | 24 months | Council of Ministers, Ministry of Finance, General Directorate of Taxation (DPT) | Capacity building/ human resources | |
| 4.2 Promotion of reliable information, enhancement of media literacy awareness and education, and strengthening of citizens' digital skills, with the aim of increasing societal resilience to disinformation | 4.2.1 Prominent publication of editorial policies and standards for content moderation in the media, enabling audiences to clearly understand news selection and fact-checking processes | 12 months | Audiovisual Media Authority (AMA), professional organizations in the field, Department of Journalism, higher education institutions | Strategy/ Institutional Measures | |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|--|
| 4.2 Promotion of reliable information, enhancement of media literacy awareness and education, and strengthening of citizens' digital skills, with the aim of increasing societal resilience to disinformation | 4.2.2 Inclusion of Media and Information Literacy (MIL), together with digital skills, in pre-university and university curricula | 24 months | Council of Ministers, Ministry of Education, Audiovisual Media Authority (AMA), higher education institutions, Student Government, Parents' Board | Strategy/ Institutional Measures | |
| | 4.2.3 Implementation of broad public awareness campaigns focused on identifying disinformation tactics and fostering critical thinking among citizens, in order to strengthen resilience to FIMI | Ongoing | Council of Ministers, Ministry of Education, Audiovisual Media Authority (AMA), higher education institutions, professional organizations in the field | Capacity building/ human resources – Public campaigns | |
| | 4.2.4 Establishment of mandatory training modules on Media and Information Literacy (MIL) and digital security at the Albanian School of Public Administration (ASPA) | 24 months/ Ongoing | Ministry of Public Administration (MAPA), National Authority for Electronic Certification and Cyber Security (AKSK), Audiovisual Media Authority (AMA), Albanian School of Public Administration (ASPA) | Capacity building/ human resources | |

4. CONCLUSIONS

The findings from monitoring the first six months of implementation of the National Strategy against Foreign Interference and Disinformation 2025–2030 indicate that the practical implementation of the measures remains at a very early stage of development. Of the 28 measures analysed under Objectives I and IV, none had been fully implemented at the time of monitoring, while 64% show no measurable progress or lack sufficient information for assessment. Only 36% of the measures are in initial planning or early implementation stages.

The progress observed has been concentrated mainly in measures related to strengthening institutional capacities, interinstitutional coordination, and engagement with international partners in the areas of cybersecurity and hybrid threats. By the other hand, measures requiring amendments to primary and secondary electoral legislation, the development of new digital infrastructures for political finance transparency, the establishment of new institutional mechanisms for monitoring foreign information interference, and the structured support of media literacy remain largely unimplemented.

One of the key findings of the monitoring concerns the absence of a clear and consolidated framework for coordinating and overseeing the implementation of the Strategy. The conclusion of the mandate of the ad hoc parliamentary committee and the absence of a dedicated structure for parliamentary oversight of the Strategy in the current legislature have created an institutional gap at the level of political and strategic monitoring of its implementation.

At the same time, the dedicated structure for identifying and responding to foreign information interference and disinformation, envisaged in the Strategy as a central interinstitutional coordination mechanism, has not yet been established. The absence of this mechanism limits the possibility of systematic coordination among responsible institutions in policy areas that directly intersect with electoral security, cybersecurity, media policy, and public education.

Another factor affecting the pace of implementation is the non-adoption of the Action Plan by the Council of Ministers, despite its adoption being foreseen within 2025. The absence of this document has created institutional uncertainty regarding concrete implementation roles and timelines, resulting in differing interpretations among responsible institutions regarding the operational character of the Strategy. In this context, approximately 70% of the institutions assigned responsibilities under the Strategy have not reported the initiation of concrete implementation actions during the monitoring period.

The complexity of the policy field of foreign information interference and disinformation, which combines elements of cybersecurity, electoral processes, media freedom, media literacy, personal data protection, and international cooperation, requires clear horizontal interinstitutional coordination mechanisms and the alignment of measures with the existing legal mandates of responsible institutions. The involvement of a large number of institutions in the implementation of the Strategy makes it essential to clarify functional responsibilities and establish sustainable cooperation mechanisms.

Although the implementation of the Strategy will continue until 2030, and more measurable results are expected to become visible in later implementation phases, developments during the first year remain decisive for establishing the institutional foundation for implementation and for the long-term credibility of the mechanisms envisaged under the Strategy.

5. RECOMMENDATIONS

During the first year of implementation (2025–2026), the primary priority should be the establishment of the institutional and procedural foundations for the effective and coordinated implementation of the Strategy.

In this context, the Council of Ministers should prioritise the drafting and adoption of the Action Plan for the implementation of the Strategy, clearly defining concrete implementation timelines, progress indicators, and mechanisms for periodic interinstitutional reporting. The adoption of this document is essential for harmonising institutional interpretations of the role of the Strategy and for transitioning from a strategic orientation phase to an operational implementation phase.

At the same time, it is necessary to establish a sustainable interinstitutional coordination mechanism for addressing foreign information interference and disinformation, in line with the provisions of the Strategy. This mechanism should enable information-sharing among responsible institutions and contribute to strengthening coordinated response capacities to risks related to the integrity of electoral processes and the security of public information.

It is also important to re-establish an effective parliamentary oversight mechanism for the implementation of the Strategy through periodic institutional reporting and structured discussions within the relevant parliamentary committees. Parliamentary oversight represents an essential element for ensuring transparency and accountability in the implementation of strategic measures of a cross-sectoral nature.

At the sectoral level, responsible institutions are recommended to prioritise the implementation of measures directly related to the integrity of electoral processes, including the development of digital platforms for political finance transparency, the improvement of oversight mechanisms for campaign expenditures, as well as the regulation of transparency of political advertising in the online environment and the role of third parties during electoral campaigns.

In parallel, it is necessary to accelerate the development of structured national programmes for media literacy and public awareness on disinformation, as well as to strengthen interinstitutional cooperation mechanisms between public institutions, the media, and civil society organisations in this field.

Finally, ensuring sustainable budgetary support for the implementation of the Strategy and for the gradual development of human capacities and technological infrastructure represents a key condition for achieving its objectives and for strengthening institutional and societal resilience to foreign information interference and disinformation, both during electoral periods and beyond.



Implementation of the National Strategy against Foreign Interference and Disinformation:

Electoral Integrity, Media Resilience, and Public Awareness

Assessment of Objectives I and IV in the first six months of implementation

