

Implementation of the National Strategy against Foreign Interference and Disinformation: National Security, Economy, and Critical Sectors

Assessment of Objectives II and III during the first six months of implementation



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Implementation of the National Strategy against Foreign Interference and Disinformation: National Security, Economy, and Critical Sectors

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EXECUTIVE SUMMARY

The National Strategy against Foreign Interference and Disinformation 2025–2030 aims to strengthen Albania’s institutional resilience to hybrid interference by addressing not only information manipulation but also risks affecting national security, strategic economic sectors, and malicious influence through investments or structural economic dependencies. This report assesses the first six months of implementation of Objectives II and III of the Strategy, which relate respectively to the protection of national security and to strengthening the resilience of the economy and critical sectors.

The main finding of the monitoring exercise is that implementation of these objectives remains at an early stage and largely dependent on further development of the legal and institutional framework. Of the 16 measures analysed, none has been fully implemented, while 62% have not yet entered the implementation phase or are not supported by sufficient publicly available information to assess progress. Only 38% of the measures are in early stages of implementation, mainly in the form of preparatory and coordination activities at the institutional level.

The progress observed so far is primarily linked to measures supported by existing strategic and regulatory instruments, particularly in the areas of monitoring foreign investments, improving transparency of financial flows, and strengthening institutional cooperation in the banking and financial sectors. However, several of these developments do not stem directly from the implementation of the Strategy itself but rather from broader reform processes related to alignment with European Union standards and other national strategic frameworks.

In the area of national security and responses to hybrid interference, the report highlights the absence of concrete developments in several key measures of the Strategy, including the adoption of a dedicated legal framework on foreign interference and disinformation, the establishment of the Responsible Structure foreseen to coordinate institutional responses, and the creation of a permanent parliamentary oversight mechanism for monitoring implementation of the Strategy. The absence of these core elements has directly affected the pace of implementation and contributed to uncertainty regarding institutional responsibilities.

In the economic dimension and the protection of strategic sectors, the Strategy envisages the development of a regulatory framework for screening foreign investments, monitoring dependencies on high-risk suppliers, and strengthening transparency of financial flows and beneficial ownership structures. While some steps have been taken in this direction—including initiatives aimed at alignment with Regulation (EU) 2019/452 on the screening of foreign direct

investment—a comprehensive legal and institutional architecture enabling a coordinated national approach to protecting critical sectors is still lacking.

The report also finds that several measures included in the Strategy remain relatively general in nature and lack clearly defined institutional responsibilities and implementation steps. In some cases, this has resulted in overlaps with existing institutional mechanisms or uncertainty regarding the roles of responsible institutions in implementing specific measures.

The findings suggest that further progress in implementing Objectives II and III will depend decisively on the adoption of the Strategy's Action Plan, the establishment of the coordinating structure foreseen in the Strategy, and the advancement of the legal framework addressing hybrid interference and the protection of strategic sectors of the economy. In the absence of these elements, there is a risk that the Strategy may remain a policy framework without the operational instruments required for its effective implementation.

1. CONTEXT

Over the past decade, interference by malicious foreign entities has become a serious threat to the stability of Albania's democracy, the country's national security, and its sustainable economic development. Although these phenomena have global dimensions, Albania's status as a NATO member state and a candidate country for accession to the European Union places it within a clearly Western geopolitical context, where institutional and economic stability are increasingly challenged by hybrid interference from rival actors.

In response to these threats, in February 2024 the Assembly of Albania established a Special Committee on Countering Disinformation. One of the main outcomes of the one-year work of this committee, carried out in cooperation with national security institutions and civil society actors, was the drafting of the National Strategy against Foreign Interference and Disinformation 2025–2030, adopted in July 2025. This document sets out the strategic directions of the Albanian state for preventing, identifying, and addressing foreign interference across different areas relevant to the functioning of democratic institutions and the country's security.

The Strategy aims to ensure the protection of democratic institutions and processes from coordinated interference by foreign actors, which manifests through a range of hybrid instruments, including information manipulation, economic pressure, interference in strategic sectors, and cyberattacks. Such interference risks undermining public trust in institutions, economic stability, and the functioning of the rule of law.

Within this framework, the Strategy provides for four main objectives addressing different dimensions of the phenomenon. This report focuses on assessing the initial progress in the implementation of Objective II and Objective III, which relate respectively to strengthening capacities to safeguard national security against hybrid interference and to increasing the resilience of the national economy and strategic sectors against malicious influence by foreign actors.

Objective II aims to strengthen capacities for the early detection, identification, and response to hybrid interference through improved inter-institutional coordination, protection of critical infrastructure, development of strategic communication with the public, strengthening of cyber capacities, and expansion of cooperation with the private sector and international partners, particularly NATO and the European Union.

Meanwhile, **Objective III** aims to protect the national economy and strategic sectors from foreign interference through strengthening mechanisms for monitoring and controlling capital flows in the economy, addressing risks related to investments in critical sectors, and enhancing institutional capacities to prevent malicious influence affecting the country's financial system and strategic infrastructure.

2. PURPOSE AND METHODOLOGY

This report focuses on assessing the initial progress in the implementation of Objective II and Objective III of the National Strategy against Foreign Interference and Disinformation 2025–2030 during the first six months of its implementation. In particular, the analysis examines the steps taken to strengthen national security capacities for identifying and responding to hybrid interference, protecting critical infrastructure, and developing strategic communication, as well as measures related to safeguarding the national economy and strategic sectors from malicious foreign interference.

Objectives I and IV are addressed in a separate monitoring report, which focuses on the electoral dimension, media freedom, and public awareness.

The assessment covers the period July 2025–early January 2026 and focuses on initial institutional steps and progress in establishing implementation mechanisms. It does not aim to measure the long-term impact of the Strategy on the information environment, institutional resilience, or democratic sustainability, but rather to identify the current level of institutional preparedness for implementing the measures envisaged in the Strategy.

The purpose of this report is to provide an assessment of the progress achieved in implementing the measures set out 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 its adoption.

The report evaluates the implementation of 16 measures envisaged under two of the four objectives of the Strategy:

- Objective II: Protection of national security from malicious foreign interference
- Objective III: Protection of the national economy and strategic sectors

This report is based on a structured monitoring methodology designed to assess progress in the implementation of the National Strategy against Foreign Interference and Disinformation, with respect to Objectives II and III, through the analysis of institutional documents, qualitative assessment, and empirical verification of available data.

The primary unit of assessment consists of the measures envisaged in the Strategy and in the corresponding Roadmap. These measures are organised according to strategic objectives and thematic areas, enabling a structured analysis of interventions at the public policy level. For each measure, a standard assessment matrix has been developed, covering five main dimensions:

- clarity of the measure
- alignment with other national strategic documents
- implementation status
- results achieved
- level of institutional transparency

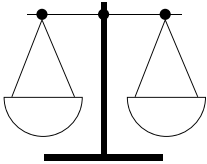
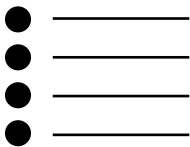
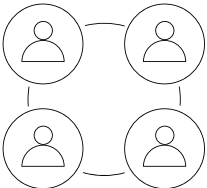
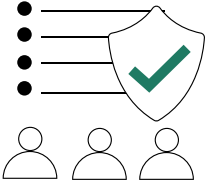
The clarity of the measure assesses whether objectives, concrete actions, and responsible institutions are clearly defined. Alignment analyses the relationship of each measure with other strategic documents, such as the National Security Strategy 2024 and the National Cybersecurity Strategy 2025–2030, in order to evaluate the level of cross-sector policy coherence in this area.

The implementation status is classified into clear categories: “not implemented”, “under implementation”, or “partially implemented”, reflecting the current level of institutional progress. Meanwhile, the results dimension seeks to identify whether the measures have produced verifiable outputs during the initial phase of implementation, while transparency assesses whether institutions have publicly disclosed information regarding their progress.

The methodology does not limit itself to a formal assessment of the status of individual measures but also includes an analysis of the interdependence between them. In many cases, the non-implementation of key measures—such as the absence of the relevant legal framework or responsible institutional structures—directly affects the feasibility of implementing other related measures. This dimension makes it possible to identify structural constraints in the implementation process, rather than only administrative delays.

In addition to the assessment across the dimensions described above, the monitored measures were also classified according to the typology of intervention envisaged in the Strategy. This classification enables a clearer analysis of progress according to the nature of the measures—legal, institutional, operational, and public awareness—and helps identify areas where progress remains more limited, as presented in Table 1 below.

Table 1: Typology of monitored measures according to the nature of intervention

Measures	Key indicators
<p>Legal and regulatory measures</p> 	<ul style="list-style-type: none"> • Drafting a regulatory framework for the screening and control of foreign investments (Foreign Investment Screening Mechanism – FISM) • Improving the legal framework for monitoring and controlling capital flows in the economy • Establishing standards and rules for the protection of strategic sectors and limiting dependence on insecure suppliers • Strengthening the legal framework for transparency and oversight of investments and financial flows
<p>Institutional measures</p> 	<ul style="list-style-type: none"> • Establishing and strengthening the capacities of institutions responsible for national and economic security • Strengthening the capacities of public and private institutions that manage critical infrastructure • Creating mechanisms for identifying and addressing vulnerabilities in critical systems • Strengthening the role of financial and regulatory institutions in monitoring economic risks
<p>Operational and coordination measures</p> 	<ul style="list-style-type: none"> • Increasing coordination and information-sharing among public institutions and other stakeholders • Establishing a strategic communication system for rapid and reliable public information • Conducting tests and simulations to assess the impact of hybrid interference on infrastructure • Organizing national and international exercises to respond to hybrid threats • Strengthening cooperation with the private sector, media, and civil society • Enhancing cooperation with NATO and the EU to identify and counter hybrid interference • Supporting international solidarity and coordination in responding to threats
<p>Awareness-raising and educational measures</p> 	<ul style="list-style-type: none"> • Improving public communication on economic and financial risks related to foreign interference • Increasing public transparency regarding strategic investments and economic activities • Promoting reliable information to reduce the impact of disinformation in the economic sector • Encouraging cooperation with the media and public actors to raise awareness about hybrid threats

Data sources include official documents (laws, strategies, draft legal acts), information obtained from public institutions through access to information requests, as well as materials published by institutions responsible for specific sectors, including the Bank of Albania and other state agencies. In cases where official information is missing or incomplete, this is identified as an issue of institutional transparency and is taken into account in the overall assessment.

An important element of the methodology is qualitative critical assessment. Beyond the summary tables presenting the status of measures, the report analyses their content, identifies conceptual ambiguities, legal gaps, and potential implementation risks—including risks related to possible restrictions on fundamental freedoms or unnecessary institutional intervention.

The methodology also seeks to identify systemic gaps in institutional reporting and monitoring processes, including the absence of standardised methodologies for data collection and publication, as well as challenges related to inter-institutional coordination in the implementation of the Strategy.

The assessment was conducted in the absence of an adopted Action Plan for the implementation of the Strategy, which has affected the availability of institutional information and the interpretation of the implementation status of certain measures by the responsible institutions.

3. ASSESSMENT OF THE IMPLEMENTATION OF OBJECTIVES II AND III OF THE STRATEGY

**3.1 Measures envisaged under Objectives
II and III of the Strategy**

**3.2 Responsible institutions for the
implementation and oversight
of the Strategy**

3.3 Implementation status of the measures

This chapter presents an assessment of the initial progress in the implementation of the measures envisaged under Objective II and Objective III of the Strategy during the period July 2025 – early January 2026, analysing institutional, legal, and operational developments related to strengthening capacities to respond to hybrid interference and protecting strategic sectors of the national economy.

3.1 Measures envisaged under Objectives II and III of the Strategy

A total of 16 measures are envisaged under Objective II and Objective III of the Strategy, of which 10 measures fall under Objective II (7 in the first thematic area and 3 in the second thematic area) and 6 measures fall under Objective III (4 in the first thematic area and 2 in the second thematic area). The implementation timelines for these measures are divided into several categories: some measures have clearly defined timeframes, mainly within the period 2025–2026, particularly those related to the development of the legal framework and the establishment of institutional structures; others are defined as ongoing measures, implying continuous implementation without a clearly specified final deadline; while several measures have a periodic character, such as regular institutional reporting or monitoring and public information activities.

The typology of measures under these two objectives reflects a combined approach involving legal, institutional, operational, and public awareness interventions. More specifically, the measures can be classified into four main categories: (i) legal and regulatory measures, aimed at establishing or improving the normative framework for addressing foreign interference and protecting strategic sectors; (ii) institutional measures, which foresee the establishment or strengthening of structures and oversight mechanisms; (iii) operational and coordination measures, related to inter-institutional cooperation, information exchange, and monitoring of critical sectors; and (iv) public awareness and education measures, aimed at increasing resilience to disinformation and hybrid interference (see Figure 1).

Figure 1: Typology of measures envisaged under the Strategy



Measures envisaged under Objective II primarily focus on strengthening the legal and institutional framework for addressing foreign hybrid interference, as well as on developing mechanisms for inter-institutional coordination and strategic communication with the public. In this regard, the Strategy provides, among other actions, for the drafting of a dedicated law in this area, the establishment of a national dedicated structure, the strengthening of coordination mechanisms and parliamentary oversight, and the development of cooperation with the media and fact-checking actors. In parallel, a set of measures aims to increase public awareness and support the development of media literacy policies through the preparation of strategic documents and the organisation of information and educational activities.

Meanwhile, the measures envisaged under Objective III focus on strengthening the protection of the national economy and strategic sectors from foreign interference through a combination of legal, institutional, and cooperative measures. These include the establishment of a regulatory framework for the screening of foreign investments, the creation of mechanisms for monitoring strategic sectors and limiting dependency on high-risk suppliers, as well as strengthening capacities to identify and address disinformation in the financial sector. At the same time, the Strategy provides for increased information exchange between public institutions and the private sector, as well as improved public transparency regarding investments and financial flows of strategic importance.

Overall, the measures envisaged under these two objectives aim to establish a comprehensive approach to strengthening national security and economic resilience against foreign interference. However, they are characterised by a relatively high level of generality and a considerable dependence on the further development of the legal and institutional framework required for their effective implementation.

3.2 Responsible institutions for the implementation and oversight of the Strategy

The institutional framework for the implementation and oversight of the National Strategy against Foreign Interference and Disinformation 2025–2030 is based on a combination of parliamentary, executive, and sectoral mechanisms, which are envisaged to cooperate in implementing the measures set out under Objectives II and III.

The parliamentary Special Committee “On coordinating and overseeing all institutional actions to combat disinformation and other forms of foreign interference in the country’s democratic processes” exercised its functions 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 approval of the National Strategy against Foreign Interference and Disinformation 2025–2030.”

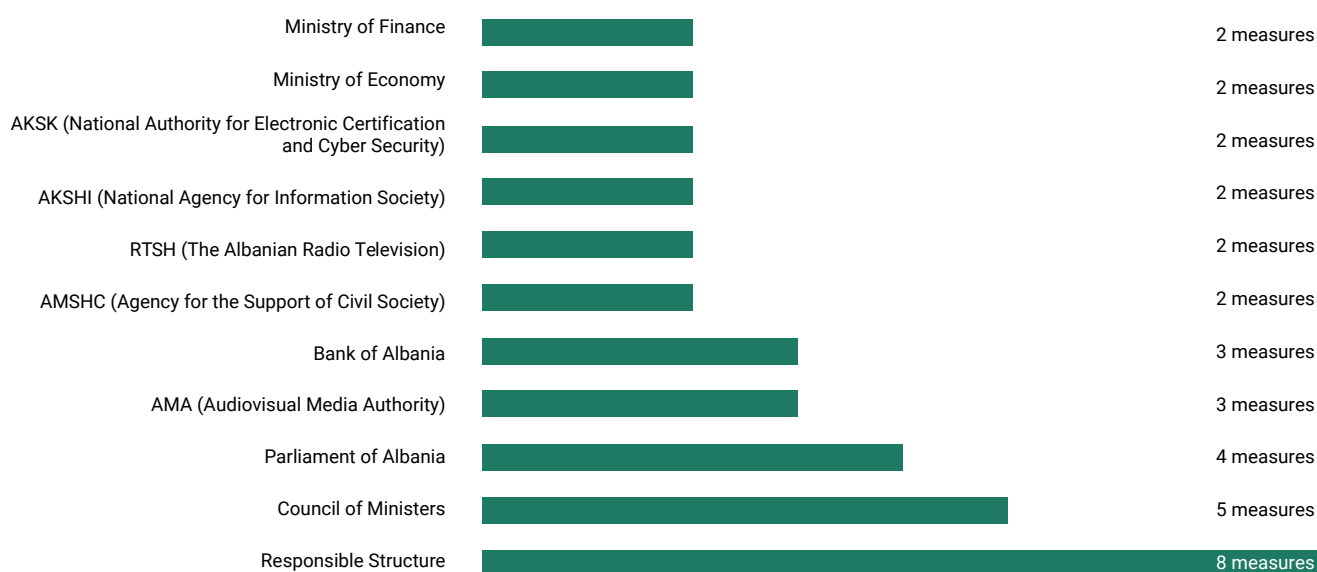
In the current legislature of the Assembly of Albania, the establishment of a dedicated parliamentary committee on malicious foreign interference and disinformation has not been envisaged. As a result, an institutional gap is evident in terms of specialised parliamentary oversight of the implementation of the Strategy, as well as uncertainty regarding the structures responsible for monitoring its implementation progress.

The Strategy assigns the Council of Ministers responsibility for drafting and adopting the Action Plan for its implementation within 2025, as well as for ensuring budgetary support for the measures and investments envisaged. At the same time, the Strategy provides for the establishment of a dedicated structure for identifying and addressing malicious foreign interference and disinformation, which is expected to play a central inter-institutional coordination role and to assume direct responsibility for implementing a significant number of measures, particularly within the framework of Objectives II and III.

However, as of the time of publication of this report, the Action Plan has not been adopted and the dedicated structure has not yet been established or designated. The absence of these key elements of the implementation architecture has affected the pace at which implementation of the measures has begun and has created uncertainty regarding institutional responsibilities in several areas of intervention covered by the Strategy.

The distribution of measures under Objectives II and III reflects an institutional architecture shared across political, regulatory, financial, and technical institutions. Within this structure, the “responsible structure” envisaged by the Strategy is expected to play the primary coordination role, while the Council of Ministers and the Assembly of Albania hold a central role in developing the legal framework and overseeing implementation. At the same time, sectoral institutions such as the Bank of Albania, the Audiovisual Media Authority, and other technical agencies contribute to the monitoring and practical implementation of measures within their respective sectors (see Figure 2).

Figure 2: Number of measures by responsible institution



In the absence of the envisaged coordinating structure and an adopted Action Plan, there is a risk that the distribution of responsibilities among institutions will remain fragmented and unclear, thereby limiting the effectiveness of inter-institutional coordination mechanisms and of parliamentary and executive oversight of the Strategy's implementation during this initial phase.

3.3 Implementation status of the measures

Based on the analysis of data relating to the 16 measures envisaged under Objectives II and III of the Strategy (see Tables 1 and 2), it appears that implementation has not yet started for the majority of them, or that there is insufficient publicly available information to assess their concrete progress. In total, 10 measures, representing 62% of the analysed measures, fall within this category. Meanwhile, 6 measures, or 38%, are considered to be in the initial stages of implementation, mainly in the form of preparatory, coordination, or institutional planning actions (see Figure 3).

During the monitoring period, no measure was identified as fully implemented. This result reflects the fact that a considerable number of the measures envisaged under these two objectives depend on the adoption of the relevant legal framework, the establishment of dedicated institutional structures, and the approval of the Action Plan for the implementation of the Strategy, none of which had been finalised at the time of publication of this report.

Overall, the distribution of implementation status indicates that progress to date remains concentrated mainly in the early stages of institutional organisation and inter-institutional coordination, while measures of a regulatory, structural, and operational nature have not yet entered more advanced stages of implementation.




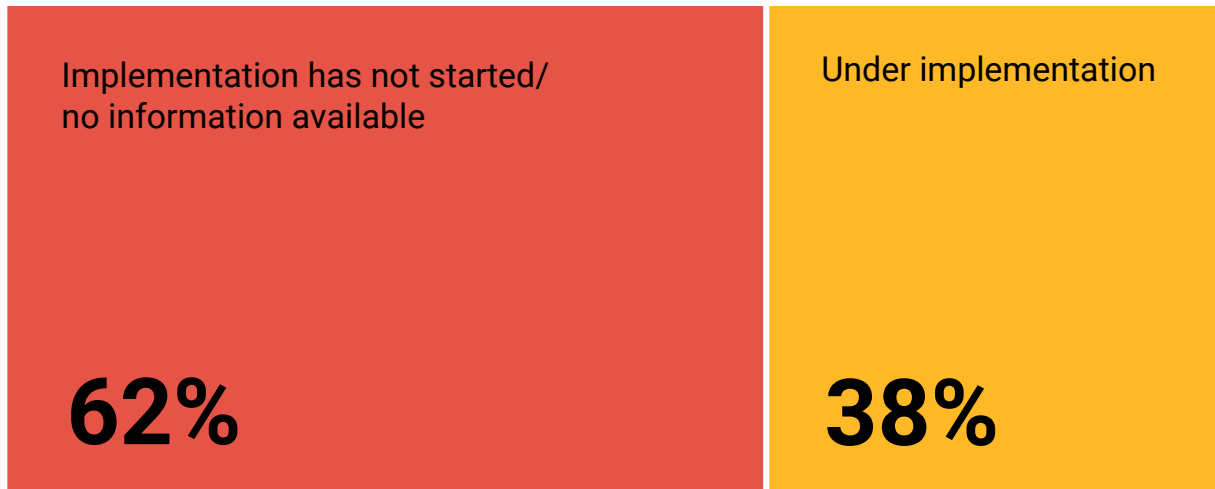
-  → Implementation not started / no information available (10 out of 16 or 62%)
-  → Under implementation (6 out of 16 or 38%)
-  → Fully implemented (0 out of 16 or 0%)

Figure 3: Distribution of measures by implementation status

3.3.1 Objective II: Protection of national security from malicious foreign interference

Objective II includes a series of commitments and measures that derive from the treatment of hybrid warfare in the National Security Strategy (NSS) 2024¹ and from the policy objectives of the National Cybersecurity Strategy 2025–2030.²

The commitments and measures are organised into two main areas: (1) improving the legal framework and strengthening institutional capacities for identifying and addressing attempts at foreign interference and disinformation; and (2) increasing public awareness of instruments of interference and strengthening public education on disinformation.

The objective also contains a number of declarative statements, including commitments to strengthen the capacity for early detection and response to hostile hybrid activities, enhance the ability to identify vulnerabilities and understand the consequences of hybrid interference, increase inter-institutional cooperation, and expand cooperation with the private sector, the media, non-profit organisations, and the education system.

However, given their general and declarative nature, these commitments do not clearly specify the concrete needs required to address hybrid threats in the Albanian context. This lack of clarity is

¹ National Security Strategy 2024, <https://www.mod.gov.al/images/PDF/2024/strategjia-kombetare-2024.pdf>.

² National Cybersecurity Strategy 2025–2030, <https://aksk.gov.al/wp-content/uploads/2025/10/Strategjia-Kombetare-per-Sigurine-Kibernetike-2025-2030.pdf>

reflected in the limited precision of the objectives of specific measures and in the allocation of institutional responsibilities for their implementation. In addition to these structural shortcomings, the Council of Ministers and the Assembly of Albania have not taken the necessary steps to prepare a law on foreign interference and disinformation, while the Council of Ministers has not taken the necessary measures to establish the Responsible Structure for addressing attempts at malicious interference and disinformation. The absence of these two key measures has negatively affected the implementation of other measures under this objective.

Area 1: Improving the legal framework and strengthening institutional capacities to identify and respond to interference and disinformation attempts

This area contains seven measures. One of them provides for drafting a law to define the scope of activity related to the prevention of foreign interference and disinformation and to clarify institutional responsibilities (**Measure 2.1.1**). Linked to this legal measure are two institutional measures: one for establishing the Responsible Structure (**Measure 2.1.2**), which should have the main role in coordinating institutional responses to attempts at interference and disinformation, and another for building capacities and increasing interinstitutional coordination (**Measure 2.1.3**). Meanwhile, of the remaining four measures, two are related to the need to establish a permanent parliamentary committee (**Measure 2.1.4** and **Measure 2.1.5**) on foreign interference and disinformation, while the other two aim to increase cooperation between institutions and the media for verifying the accuracy of information, as well as for media self-regulation and co-regulation (**Measure 2.1.6** and **Measure 2.1.7**).

It should be reiterated that all seven of these measures remain unimplemented, even though they were supposed to be implemented by December 2025, according to the provisions of the Strategy Roadmap. Meanwhile, the permanent parliamentary committee should have been established by October 2025. Apart from the two measures related to the establishment of the permanent parliamentary committee, the implementation of the remaining measures is linked to the drafting of the law and the establishment of the Responsible Structure. The non-implementation of these measures negatively affects the implementation of the others, as the Responsible Structure is the institution responsible for implementing four of the seven measures.





Although the measures are broadly linked with some of the political objectives of the National Security Strategy and the National Cybersecurity Strategy, they need to be clarified both in terms of the ultimate goals they aim to achieve and in terms of institutional responsibilities.

Particularly problematic are the measure aimed at increasing cooperation between institutions and the media for verifying the accuracy of information and the one concerning media self-regulation and co-regulation. Neither of these measures includes a defined sequence of actions that should be

taken for their implementation, which makes their implementation difficult and potentially harmful in the absence of clarity regarding the objectives of these policies. In the first case, the risks of public institutions intervening to censor information under the pretext of combating disinformation are high, and it is therefore necessary to establish the appropriate legal mechanisms to prevent possible abuses. Similar risks can also be observed in the implementation of the measure on co-regulation and self-regulation. In this case as well, no specific actions are foreseen, while it should also be clarified what is meant by the terms “co-regulation” and “self-regulation,” as at first glance they appear to contradict one another.

Table 2: Assessment of measures under Objective II – Area 1

Measures	Clarity	Harmonization	Implementation	Implementation Status
2.1.1 Drafting of a legal act on foreign interference and disinformation	The measures and the responsible institutions are clear.	NSS 2024 – National Security Strategy 2024 NCSS 2025–2030 – National Cybersecurity Strategy 2025–2030		Not implemented
2.1.2 Establishment of a dedicated structure for identifying and addressing attempts of interference and disinformation (“Responsible Structure”)	It is unclear whether the institution will have research, policymaking, policy implementation functions, or all of these combined. Interinstitutional coordination is unclear, and the responsibilities of each institution are not clearly defined.	NSS 2024 – National Security Strategy 2024 NCSS 2025–2030 – National Cybersecurity Strategy 2025–2030		Not implemented

<p>2.1.3 Interinstitutional coordination and capacity-building of the responsible institutions for identifying and addressing attempts of interference and disinformation</p>	<p>It is unclear what the communication network should include beyond the identification of institutional contacts and how interinstitutional coordination should be carried out.</p>	<p>NSS 2024 – National Security Strategy 2024 NCSS 2025–2030 – National Cybersecurity Strategy 2025–2030</p>		<p>Not implemented</p>
<p>2.1.4 Permanent parliamentary committee on malicious foreign interference and disinformation</p>	<p>The measure and the responsible institution are clear.</p>	<p>Ad Hoc Parliamentary Committee</p>		<p>Not implemented</p>
<p>2.1.5 Periodic reporting to the Parliamentary Committee by the structure to be established for detecting, analyzing, and responding to malicious foreign interference and disinformation</p>	<p>The measure and the responsible institution are clear.</p>	<p>Ad Hoc Parliamentary Committee</p>		<p>Not implemented</p>
<p>2.1.6 Establishing a communication network with media operators (online or social) and cooperation with entities engaged in fact-checking</p>	<p>The measure needs to be clarified. The responsible institution is clear.</p>	<p>NSS 2024 – National Security Strategy 2024</p>		<p>Not implemented</p>

<p>2.1.7 Establishing cooperation to promote co-regulation and self-regulation in the media sector</p>	<p>The measure needs to be clarified. The responsible institution is clear.</p>	<p>NSS 2024 – National Security Strategy 2024</p>		<p>Not implemented</p>
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Area 2: Public awareness about the instruments of interference and increasing public education on disinformation

This area contains three measures, which are closely interconnected. The first measure provides for the drafting of a national media literacy strategy and/or the integration of media literacy into general education (**Measure 2.2.1**); the second relates to the preparation of guidelines and public information materials on interference and disinformation (**Measure 2.2.2**); while the third concerns activities aimed at public education on interference and disinformation (**Measure 2.2.3**). The deadline for implementing the first measure is within 2026, while the other two measures do not have a specified deadline.

The first and third measures remain unimplemented, while the second is currently under implementation. Since the institution responsible for implementing all three measures is the Responsible Structure, it would be expected that all three measures would remain unimplemented. However, it appears that the Agency for the Support of Civil Society (AMSHC) is undertaking the implementation of this measure, which AMSHC has included in its work plan for 2025–2026.³ In its response to our request for information, AMSHC did not explain the reasons why it had taken the lead in implementing this measure, given that it is not legally the responsible institution. It is also unclear why the Ministry of Education has not been included among the responsible institutions for implementing the first measure, which foresees the drafting of a national media literacy strategy, particularly if such a program is to be integrated into general education.

Overall, the measures are linked to some of the political objectives of the National Security Strategy (2024) and the National Cybersecurity Strategy, but they remain broad and unclear in terms of what

³ Information obtained from the Agency for the Support of Civil Society on 7 January 2026 in response to an access to information request.

they aim to achieve. The way the first measure is written effectively outlines not one measure but three. It leaves open the possibility for (1) drafting a national media literacy strategy, (2) integrating media literacy into general education without first drafting a strategy, or (3) implementing both. Moreover, from a conceptual standpoint, it appears contradictory for the first measure to envisage drafting a media literacy strategy, while the two subsequent measures—which should logically be treated as part of such a strategy—are foreseen without the need to consider them within the framework of that strategy. Consequently, either the media literacy strategy is unnecessary, or the two measures have been proposed prematurely.

Table 3: Assessment of measures under Objective II – Area 2

Measures	Clarity	Harmonization	Implementation	Implementation status
2.2.1 Drafting a national media literacy strategy and/or integrating media literacy into general education	The measure is unclear. The absence of the Ministry of Education’s involvement is also unclear.	NSS 2024 – National Security Strategy 2024		Not Implemented
2.2.2 Preparation of guidelines/materials for broad public information on interference and disinformation	The measure needs to be clarified. The responsible institution is clear.	NSS 2024 – National Security Strategy 2024		AMSHC has not issued the relevant notifications regarding the implementation of the measure.
2.2.3 Activities aimed at public education on interference and disinformation	The measure needs to be clarified. The institution responsible for implementing the measure is clear.	NSS 2024 – National Security Strategy 2024		Not Implemented

3.3.2 Objective III: Protection of the national economy and other critical sectors

The key aim of this objective is to strengthen the legal framework and institutional practices to prevent malicious foreign interference in the strategic sectors of the Albanian economy and through strategic investments.

Through this objective, a number of commitments have been made to develop a regulatory framework for screening foreign investments, promote the use of secure technologies, and ensure the supply of critical infrastructure by trusted suppliers. These commitments are translated into measures under the first area, “strengthening law-enforcement mechanisms for monitoring and controlling capital in the domestic economy.”

In addition to this area, the objective includes several measures under the second area—“increasing communication and information exchange between public institutions and the banking sector in preventing risks and informing the public”—which are part of the Strategy Roadmap but were not included in the section of the strategic document that addresses the goals of the strategic objectives. Several of the measures under this objective are currently being implemented, although they are being carried out in accordance with existing institutional measures and not necessarily as a result of the requirements of the Strategy against Foreign Interference and Disinformation (“the Strategy”).

Area 1: Strengthening law-enforcement mechanisms for monitoring and controlling capital in the domestic economy

This area contains four measures, three of which aim to create a regulatory framework for the verification and screening of foreign investments. They include drafting a law on the screening of foreign investments, establishing a monitoring system for investments in strategic sectors, and monitoring and limiting dependence on insecure suppliers. Meanwhile, the fourth measure aims to establish a national-level unit to monitor false information in critical sectors/the banking and financial system (**Measure 3.1.4**). Although all four measures are currently under implementation, their implementation is being carried out in accordance with existing strategic and institutional obligations that do not fundamentally correspond to the objectives of the Strategy.

With regard to the implementation of the first and second measures, a draft decision of the Council of Ministers proposed by the Ministry of Economy and Innovation—rather than a law as required by the Strategy—contains provisions for monitoring and screening foreign investments. The purpose of the draft decision is to regulate the screening of foreign direct investments affecting sensitive and strategic sectors of the Albanian economy.

The draft decision has been prepared in accordance with the objectives of the National Reform Agenda 2024–2027, which refer to improving economic governance, promoting foreign direct investment, and ensuring digital infrastructure.⁴ It aims to incorporate into Albanian legislation the provisions of European Union Regulation 2019/452.⁵ According to the draft decision, the ministry responsible for the economy would conduct verification of foreign investors by obtaining the necessary information from other national institutions and from foreign counterpart institutions before the assessment carried out by the Interministerial Committee for the Screening of Foreign Direct Investments, which is chaired by the same ministry.⁶ It should be emphasized that the draft decision is intended to apply only to investments in the information access and media sector. It is not intended to apply to critical infrastructure, critical technology, or dual-use goods until Albania becomes a member of the European Union.⁷

With regard to the third measure, which refers to monitoring and limiting dependence on insecure suppliers, the current legislation on beneficial ownership and procurement in the security and defense sector includes a number of mechanisms for monitoring and limiting dependence on insecure suppliers. The provisions of the legislation on procurement in the security and defense sector are linked with those on classified information and industrial security due to the procedures for verifying economic operators involved in classified procurement procedures.⁸ One of the most important provisions of this legislation, which helps in the process of tracing and preventing malicious influence in the country's strategic sectors, is the requirement that the ownership of economic operators be "at least 51% owned by individuals with Albanian citizenship... and no more than 5% owned by individuals... [with] the citizenship of a country that is not a member of NATO, the EU, or another state [without a bilateral security agreement]."⁹

Ownership verification is based on the register of beneficial owners maintained by the National Business Center. However, despite the existence of a legal framework for beneficial ownership, there are significant regulatory and institutional gaps that prevent it from being effective in preventing

⁴ Explanatory Report on the Draft Decision of the Council of Ministers "On the Approval of the Regulation on Procedures for the Assessment and Screening of Foreign Direct Investments Related to or Affecting Critical Public Infrastructure, Critical Technology and Dual-Use Goods, the Supply of Critical Data, Access to Sensitive Information, or Media Freedom," <https://www.konsultimipublik.gov.al/Konsultime/Detaje/901>.

⁵ Explanatory Report on the Draft Decision of the Council of Ministers.

⁶ See Articles 5 and 6 of the Draft Decision, <https://www.konsultimipublik.gov.al/Konsultime/Detaje/901>.

⁷ Article 19 of the Draft Decision.

⁸ See Law No. 36/2020 "On procurement in the field of defence and security," <https://www.mod.gov.al/images/akteligjore/prokurimet/ligj-2020-04-16-36.pdf>; Decision of the Council of Ministers No. 659, dated 23.10.2024, approving the Regulation "On industrial security, rules, procedures and requirements for the protection of classified information during procurement in the field of defence and security," <https://qbz.gov.al/eli/vendim/2024/10/23/659>; Law No. 10/2023 "On classified information," <https://tinyurl.com/mzbpjh34>.

⁹ Article 14, paragraph 1(g) of Decision of the Council of Ministers No. 659, dated 23.10.2024.

malicious foreign interference in the Albanian economy.¹⁰ Problems in the legal framework for beneficial ownership also emerged during the hearings of the Special Parliamentary Commission to Coordinate and Oversee All Institutional Actions to Combat Disinformation and Other Forms of Foreign Interference in the Country's Democratic Processes ("the Special Commission").¹¹

Council of Ministers Decision No. 1088, dated 24.12.2020 "On Determining the Method and Procedures for the Registration and Publication of Data on Beneficial Owners, as well as Notification by Competent State Authorities and Obligated Entities," contains the detailed rules for registering beneficial owners. This decision requires owners who hold at least 25 percent ownership in an entity to declare themselves. However, it contains a provision that exempts the person responsible for registering the beneficial owners of an economic operator, as well as the economic operator itself, from the obligation to necessarily identify the beneficial owner.

Point 1(d), Section III of Council of Ministers Decision No. 1088 provides that: "In cases where, after exhausting all possible means of identifying the beneficial owner and where there are no grounds for suspicion, reporting entities cannot identify as the beneficial owner the individual who ultimately owns or controls a legal person through direct or indirect ownership of 25 (twenty-five) percent or more of the shares/quotas of capital or ownership interests in a reporting entity, according to the provisions of the law on the register of beneficial owners, reporting entities shall identify and register... the individual who: i) determines the decisions taken by a legal person; ii) controls in any way the election, appointment, or dismissal of the majority of the decision-making and/or executive bodies of the legal person." This provision undermines the stated purpose of the legislation by creating broad space for the non-disclosure of beneficial owners, particularly in cases where ownership may formally be held by an economic entity that is a shell company or trust whose owners are legally hidden. Since the core purpose of this decision is registration rather than the discovery of beneficial owners, it does not contain provisions for interinstitutional coordination among the institutions responsible for achieving this objective, even though they have been granted access to the register maintained by the National Business Center.¹²

Meanwhile, with regard to the measure for establishing a national unit to monitor false news in critical sectors/the banking and financial sector, according to the Bank of Albania this function is

¹⁰ Law No. 112/2020 "On the register of beneficial owners,"

<https://qbz.gov.al/preview/caaa4106-aab1-44bb-a34b-1ada78851423/cons/20220216>;

Decision of the Council of Ministers No. 1088, dated 24.12.2020 "On determining the manner and procedures for the registration and publication of data on beneficial owners, as well as notification by competent state authorities and obligated entities," <https://tinyurl.com/yjw9etjf>.

¹¹ Discussions on these issues were conducted in particular during hearing sessions with representatives of the Financial Intelligence Agency and the National Business Centre. See the minutes of the Special Committee meetings of 23 October 2024 and 6 November 2024. The minutes are available at the webpage of the Special Committee:

<https://www.parlament.al/struktura/8e230ff7-5344-45fb-bd6c-510f927c6b92>.

¹² Access to the register of beneficial owners has been granted to the General Directorate for the Prevention of Money Laundering, the Bank of Albania, the General Directorate of Taxation, the Financial Supervisory Authority, and the General Directorate of State Police. See Section V, paragraph 2 of Decision of the Council of Ministers No. 1088.

currently performed by its Press Office, which is planning to further strengthen the unit’s capacity to prevent and respond to the spread of false news in the financial sector.¹³ Although the Bank of Albania is the institution responsible for implementing this measure, critical sectors cannot be limited only to the banking and financial sector. Moreover, the measure does not include the specific actions that should be taken to achieve it, and therefore it is unclear why the Bank of Albania appears to be designated as the responsible institution.

The lack of clarity surrounding the fourth measure is not the only issue within this area. It is also unclear what is intended to be achieved through the second measure on the “implementation of a transparent system for monitoring investments in strategic sectors,” given that the specific actions for implementing the measure refer to maintaining balances “between executive influence, including the authority of interest groups such as the business community, in the decision-making process” for drafting the law on screening foreign investments. If the goal is to ensure that the business community is involved and informed about the monitoring system so that it has the necessary regulatory clarity, this issue could be addressed through existing legal practices for public consultations.

Meanwhile, the third measure, which addresses monitoring and limiting dependence on insecure suppliers, does not elaborate the specific actions required for its implementation, and the two key responsible institutions—the permanent parliamentary committee and the Responsible Structure—do not exist.

Table 4: Assessment of measures under Objective III – Area 1

Measures	Clarity	Harmonization	Implementation	Implementation status
3.1.1 Adoption of the law on the screening of foreign investments	The measure is clear. The division of institutional responsibilities is unclear.	National Reform Agenda 2024–2027		The Ministry of Economy and Innovation has proposed a decision of the Council of Ministers (DCM) intended to regulate the screening of foreign investments. The scope of the DCM covers only investments in the information and media sector until Albania’s accession to the EU.

¹³ Information obtained from the Bank of Albania on 16 January 2026 in response to an access to information request.

<p>3.1.2 Implementation of a transparent system for monitoring investments in strategic sectors</p>	<p>The measure is unclear. No responsible institutions have been specified.</p>	<p>National Reform Agenda 2024–2027</p>		<p>The Ministry of Economy and Innovation has proposed a decision of the Council of Ministers (DCM) intended to regulate the screening of foreign investments. The scope of the DCM covers only investments in the information and media sector until Albania’s accession to the EU.</p>
<p>3.1.3 Monitoring and limiting dependence on insecure suppliers</p>	<p>The measure and the institutional responsibilities are unclear.</p>	<p>Linked to the legislation on beneficial ownership and procurement in the security and defense sector.</p>		<p>The current legislation on beneficial ownership and procurement in the security and defense sector includes a number of mechanisms for monitoring and limiting dependence on insecure suppliers.</p>
<p>3.1.4 Creation of a specialized national-level unit to monitor false information in critical sectors/ the banking and financial system</p>	<p>The measure and the institutional responsibilities need to be clarified.</p>	<p>NSS 2024 – National Security Strategy 2024</p>		<p>Unfulfilled. The Press Office of the Bank of Albania is responsible for the banking and financial system.</p>

Area 2: Increasing communication and information exchange between public institutions and the banking sector in preventing risks and informing the public

This area includes two measures. The first measure, which aims to increase communication between the private and public sectors to examine the exposure and vulnerability of the national economy to malicious foreign interference, remains unimplemented. Moreover, its objective is not clearly defined. The description of the actions required for its implementation foresees the organization of a forum to discuss the state of markets and the vulnerabilities of the economy, but it does not specify what the expected outcome of such a forum—planned to take place annually—should be. Meanwhile, the main institution responsible for implementing this measure is the Responsible Structure, which has not yet been established.

The second measure, which aims to increase transparency toward the public regarding the state of foreign investments in Albania, is currently under implementation. As in the cases under implementation in the previous area, this measure is considered to be in progress due to the actions taken by the Bank of Albania in publishing statistics on foreign direct investments and data on the ownership of banking and non-banking financial institutions licensed by it. The Bank publishes statistics on foreign direct investment flows on a quarterly basis; however, the statistical data are not disaggregated by economic sectors.¹⁴

Although this information is valuable and partially fulfills the requirements of the measure, it remains insufficient. According to the measure, the responsible institutions—which include the Responsible Structure, the ministries responsible for finance and the economy, and the Bank of Albania—should develop a comprehensive reporting methodology and formats for each sector of the Albanian economy, not only for the banking and financial sector.

¹⁴ Statistics on foreign direct investments can be found at: https://www.bankofalbania.org/Statistikat/Statistikat_e_Sektorit_te_Jashtem/Investimet_e_huaja_direkte/; Ownership data for licensed entities can be found at: https://www.bankofalbania.org/Mbikeqyrja/Subjekte_te_licencuara/.

Table 5: Assessment of measures under Objective III – Area 2

Measures	Clarity	Harmonization	Implementation	Implementation status
3.2.1 Strengthening the interaction and communication of the private sector with public institutions	The measure and the institutional responsibilities need to be clarified.	NSS 2024 – National Security Strategy 2024		Not implemented
3.2.2 Public information on the state of the domestic economy in relation to foreign capital and investments	The measure and the institutional responsibilities need to be clarified.	NSS 2024 – National Security Strategy 2024		A comprehensive reporting methodology and format for each sector of the Albanian economy is lacking. However, the Bank of Albania publishes statistics on foreign investments.

4. CONCLUSIONS AND RECOMMENDATIONS

The findings of the monitoring covering the period July 2025 – January 2026 indicate that the implementation of the measures envisaged under Objectives II and III of the National Strategy against Foreign Interference and Disinformation 2025–2030 remains at an initial stage and is characterised by limited progress at both the structural and normative levels.

Of the 16 measures analysed under these two objectives, none has been fully implemented, while most remain at preliminary planning stages or have not yet entered implementation. Progress to date is primarily related to elements of institutional coordination and the preparation of future legal and regulatory interventions, whereas measures requiring the establishment of dedicated structures, the adoption of a legal framework addressing foreign hybrid interference, and the introduction of protection mechanisms for strategic sectors remain underdeveloped.

A key factor influencing the limited pace of implementation relates to the absence of an adopted Action Plan and the non-establishment of the Responsible Structure envisaged by the Strategy, which is expected to play a coordinating role in the implementation of a significant number of measures under Objectives II and III. In the absence of these mechanisms, the distribution of inter-institutional responsibilities remains partially unclear and risks producing fragmentation in the implementation of policies aimed at addressing hybrid interference and protecting strategic sectors of the economy.

In particular, measures related to the establishment of a legal framework on foreign interference, the screening of strategic investments, strengthening the security of supply chains, and increasing transparency regarding beneficial ownership remain essential for building a functional national resilience architecture against malicious influence.

Overall, the findings of this monitoring exercise indicate that progress during the first year of implementation of the Strategy will depend decisively on the establishment of central coordination mechanisms and on the development of the legal and regulatory framework supporting the implementation of the measures envisaged under these two objectives.

During the first year of implementation of the National Strategy against Foreign Interference and Disinformation 2025–2030, the main priority should be the establishment of the institutional and legal foundations necessary to enable the transition from programmatic measures to operational measures within the framework of Objectives II and III.

Recommendations for Objective II

First, the Assembly of Albania and the Council of Ministers should prioritise the drafting and adoption of the legal framework on foreign interference and disinformation, as well as the establishment of the Responsible Structure envisaged by the Strategy. This framework should clearly define institutional

responsibilities, mechanisms for inter-institutional coordination, and instruments for identifying and responding to hybrid interference at the national level.

In order to ensure continuity of institutional oversight, the Assembly of Albania should consider establishing a permanent parliamentary mechanism for overseeing the implementation of the Strategy and the legislation addressing malicious foreign interference and disinformation, either through the establishment of a dedicated committee or by delegating this function to a specialised subcommittee within the Committee on National Security.

In the area of cooperation with the media and fact-checking actors, it is necessary to further clarify the measures envisaged by the Strategy from both conceptual and regulatory perspectives, in order to avoid interpretations that could create risks of interference with freedom of expression. In this regard, institutional roles and the limits of public intervention should be clearly defined in relation to existing self-regulation and co-regulation mechanisms.

At the same time, the development of a dedicated strategy on media and information literacy would represent an important step towards operationalising the preventive measures envisaged by the Strategy. This process should be carried out in close cooperation with the Ministry of Education and Sports and the institutions responsible for digital policy and public communication, and should be based on a structured assessment of risks and needs at the national level.

Recommendations for Objective III

Within the framework of strengthening the protection of strategic sectors of the economy, it is necessary to advance the legal framework for the screening of foreign investments in line with European Union standards, in particular with Regulation (EU) 2019/452 establishing a framework for the screening of foreign direct investments. This framework should clearly define strategic sectors, investment screening mechanisms, and institutional responsibilities for their monitoring.

It is also recommended to develop regulatory frameworks to strengthen the security of supply chains in critical sectors such as energy, transport, healthcare, information technology, and artificial intelligence. These frameworks should address not only foreign direct investments but also trade relations and structural dependencies between domestic and international operators in sectors of strategic importance.

Strengthening transparency regarding the beneficial ownership of commercial entities remains an essential element for preventing malicious interference in the national economy. In this regard, it is necessary to review the existing legal framework and strengthen institutional mechanisms for

identifying, verifying, and analysing complex beneficial ownership structures, particularly in sectors with high strategic risk.

In order to strengthen capacities for identifying interference through information manipulation in economic and financial sectors, it is necessary to clearly define the scope of application and institutional placement of the unit envisaged for monitoring disinformation in critical sectors, clarifying its relationship with the Responsible Structure and with existing regulatory institutions.

Finally, it is recommended to strengthen cooperation between public institutions and the private sector through structured mechanisms for information exchange and strategic coordination, as well as to develop standardised methodologies for public reporting on strategic investments and financial flows, with the aim of increasing transparency and improving monitoring of risks related to foreign interference in the economy.



Implementation of the National Strategy against Foreign Interference and Disinformation:

National Security, Economy, and Critical Sectors

Assessment of Objectives II and III during the first six months of implementation

