

**Coalition for Reforms, Integration and Consolidated Institutions
(KRIIK)**

**ELECTIONS FOR THE ASSEMBLY OF ALBANIA
MAY 11, 2025**

**S T A T E M E N T
OF PRELIMINARY FINDINGS
AND CONCLUSIONS ***

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Tirana, on May 12, 2025!

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Preliminary conclusions

The Coalition for Reforms, Integration and Consolidated Institutions (KRIIK) monitored partially the process of the Parliamentary Elections of May 11, 2025, in continuation of the commitment of more than a decade in protecting the integrity of the electoral process and strengthening the standards for democratic elections.

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The elections were held in a political context characterized by deep polarization and mutual distrust between political parties. Political conflict has manifested itself continuously since the 2021 parliamentary elections, including violent clashes in the Assembly at the end of 2023 and the continued exclusion of opposition MPs from parliamentary sessions.

The electoral reform that lasted over two and a half years failed to bring about significant changes in the electoral legal framework, being characterized by a lack of transparency, delays, and deadlock. KRIIK assesses that this failure is a direct result of the lack of political will for meaningful and substantial amendments, dialogue, and compromise by the main political parties.

In July 2024, the Assembly adopted several important but minimalist amendments to the Electoral Code, without public consultation. Some of these changes are assessed positively, especially the elimination of the threshold for independent candidates, the removal of the right of party leaders to run in multiple constituencies, and the specifications for voting from abroad. In February 2025, the Electoral Code was again amended to guarantee sufficient time for overseas ballots to arrive on time. Last-minute changes undermined the stability and predictability of the legal framework.

The legal framework can generally guarantee democratic elections if fully implemented. However, issues such as preventing abuse of state resources, vote buying, voter intimidation, guarantees to the secrecy of voting, depoliticization of the electoral administration and transparency of campaign finance remain unaddressed.

The Regulatory Commission showed an approach influenced by the political parties' agenda, while the Complaints and Sanctions Commission (CSC) had a passive and evasive approach, focusing on the letter of the law and ignoring the spirit and basic principles. The State Election Commissioner and the administration professionally managed the technical aspects of the process but showed no commitment in pursuing other elements under the responsibility of the CEC, especially being tolerant of the abuse of state resources.

The Ministry of Interior reported some 3.7 million registered voters, including some 246,000 abroad. The control of the lists was facilitated through an online platform, but the CEC did not publicly review the technical audit reports. The written notification of voters was not conducted by the Municipalities.

Technical preparations for voting from abroad, voter registration and electoral education proceeded as planned, with delays that can be considered justifiable given the complexity of the process and the fact that it was being applied for the first time. KRIIK assesses that despite the challenges that accompanied this first implementation, the process of voting from abroad was conducted efficiently, transparently, and professionally by the Central Election Commission. The

high rate of refusals during registration raises questions about the effectiveness of the legal provisions for voting from abroad.

The revised legal framework removed the right of party leaders to run in multiple constituencies and eliminated the threshold for independent candidates. The new candidate list system (1/3 closed and fixed list, two-thirds open to preferential voting) is a step forward, but still grants party leaders considerable control over the final ranking, especially for the fixed list seats. During the registration process, the CEC exceeded the legal procedures, allowing the parties to make changes to the lists of candidates.

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The lack of a clear definition of what constitutes an election campaign and the lack of an unequivocal ban on campaigning before the official start allowed electoral subjects to circumvent the legal provisions, without any action from the responsible institutions. The campaign took place in a climate of deep polarization, with harsh rhetoric, personal attacks, and a lack of substantive public policy debate. Allegations of voter corruption and vote-buying abounded, as did tensions between sympathizers.

Abuse of state resources, mixing institutional activity with political activity, the approval of acts prohibited by the Electoral Code and the use of official websites of institutions for political purposes were widely present, while the CEC showed an inactive approach in addressing these issues.

The legal amendments of February 2025 eliminated the inclusion of candidate expenses in the total that an electoral subject can spend, leaving de facto the amount of expenses for party candidates without a ceiling and creating a marked disparity in their favor compared to independent candidates. Campaign financing continued to present transparency problems due to the lack of interim reporting and effective monitoring mechanisms.

Monitoring of media coverage by the Audiovisual Media Authority (AMA) showed a clear predominance of the two main parties (SP and DP) in the media, while the other parties enjoyed minimal coverage. The fact that the Audiovisual Media Authority only conducts quantitative, not qualitative, monitoring of media coverage remains problematic.

Out of 194 complaints filed with the CEC, the State Election Commissioner proposed sanctions for only four cases, of which CSC imposed administrative sanctions for only two.

Election day was generally peaceful, but with sporadic incidents involving senior political officials. The main issue remained the presence of unauthorized persons near polling stations, continuing the practice of patronage, control and direction of voters and violating the secrecy of the vote. Although voting technicalities were respected in most polling stations observed, the feeling of surveillance by political patronage is considered to have affected the real freedom of voters.

Preliminary findings

Introduction

The Coalition for Reforms, Integration and Consolidated Institutions (KRIIK), in continuation of the commitment of more than a decade in defense of the integrity of the electoral process and the strengthening of standards for democratic elections, partially monitored the process of the Parliamentary Elections of May 11, 2025.

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KRIIK continuously follows the entire pre- and post-election cycle, as well as the periods between election cycles, monitoring and evaluating not only the integrity of the elections, but also the systemic developments that affect the democratic process as a whole. In addition to following the electoral process during its development, KRIIK continuously follows the situation between the electoral processes, which enables a more complete understanding of the structural problems, and actively engages in the improvement of the legal and institutional framework, through advocacy and contribution to the reform processes of the legal framework for elections, or other initiatives to strengthen democracy.

During the pre-election period, a team of experts followed the political-institutional situation that preceded the elections, the preparations for the election process, the administration of the process by the Central Election Commission (CEC), with a special focus on the use of state resources and the public office for electoral advantage and campaign financing.

Beyond monitoring and evaluating the process, in these elections KRIIK was particularly actively engaged in strengthening the secondary regulatory framework for elections and the full and unequivocal implementation of the current legal provisions, presenting detailed recommendations to the Central Election Commission as well as continuous denunciations of violations observed in the use of state resources and public office for electoral advantage. The special focus of this intervention was the contribution to the improvement of the normative framework for the prevention of pressure on voters and the violation of the secrecy of the vote during the election day by the patronage and vote control structures, the prevention of the use of state resources and public office for electoral advantage, voting from abroad, and campaign finance. KRIIK has officially invested the CEC with 19 documents with recommendations for improving the technical and procedural aspects of the election process,¹ in addition to verbal follow-up recommendations with the administration or the governing bodies of the CEC, filed 31 denunciations,² published six statements³ and a Public Stance⁴ on various aspects of the electoral process.

On election day, KRIIK engaged 38 observers who voluntarily monitored several elements of the voting, with a special focus on meeting the criteria for secret voting, free from intimidation and quiet in the vicinity of the polling stations. The observers reported in real time on the development of the process, including the observed irregularities. KRIIK will continue monitoring the post-election process, including possible complaints and appeals; announcement of final results; the

¹ See KRIIK's [Recommendations](#).

² See KRIIK's [Denunciations](#).

³ See KRIIK's [Statements](#).

⁴ See the [Public Stance](#)

political and institutional situation after the elections; the post-election audit of election materials and ballot boxes, which will be carried out by the CEC a few months after the elections; self-reporting of election campaign income and expenses by electoral contestants, as well as financial audit and control of campaign finance by the CEC.

This preliminary statement presents KRIIK's main findings and preliminary assessment on the integrity of the electoral process. A more complete report will be published later.

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Political and institutional context

The elections were held against a political background characterized by deep political polarization and mutual distrust of political parties towards each other. While this tension was most visible between the two main parties, the Socialist Party (SP) and the Democratic Party (PD), it was also manifested by the other parties that participated in the election process. Political conflict has been manifested continuously since the last parliamentary elections of 2021, including through violent clashes in the Assembly at the end of 2023 and the continuous exclusion of opposition MPs from parliamentary sessions.

This situation, among other factors, significantly damaged the climate of political cooperation necessary for the consensus to reform the legal framework for elections. The process, which lasted over two and a half years and failed to bring about meaningful changes in the legal framework, was also characterized by a lack of transparency, deliberate procrastination, and deadlock. KRIIK estimates that the failure of reforming the legal framework for elections is a direct result of the lack of political will for meaningful changes in the legal framework for elections, open dialogue and compromise, and the placing of narrow party interests by the main political parties (SP and DP) over the public interest.⁵

The Socialist Party, in power since 2013, is considered to have consolidated control over the main decision-making institutions. This long-term dominance raises concerns about the possibility of politicization of state institutions and the use of public resources for electoral advantage. Meanwhile, the Democratic Party has experienced divisions and internal conflicts, which started immediately after the 2021 parliamentary elections and culminated in the departure of the party's leader at the time, Mr. Lulzim Basha and the return to the head of the DP of Mr. Sali Berisha. These conflicts contributed to the fragmentation of the opposition and limited its effectiveness as a balancer of governing power. In these elections, the participation of new political parties is a novelty, which mainly operated in an unsupportive political environment and with a series of difficulties arising from the legal framework or its misapplication.

The President of the Republic played a formal role in the election process, decreeing the date of the elections within the limits of the legal deadline, after consultations with the SP and the CEC, while the opposition refused to be included in these consultations. KRIIK assessed that this delay

⁵ See KRIIK's Statement "[The lack of will for dialogue and open political compromise, unacceptable and a completely harmful approach for undertaking vital reforms in the interest of Albanian citizens and a functional democracy in the country](#)", July 24, 2024.

put the preparatory and law-enforcement process for the May 11 elections under unnecessary stress.⁶

The election process of May 11, 2025, takes on a special importance in the context of the process towards the integration of Albania in the European Union, given that the democratic standards in the elections constitute one of the main evaluation criteria. In October 2024, Albania opened negotiations for cluster 1 "Foundations" and has since opened negotiations for two more. KRIIK has continuously emphasized the need for substantial improvements in the electoral process to achieve full democratic standards, especially in the context of the country's European integration.

Legal framework and electoral system

Legal framework

In July 2024, the Assembly of Albania adopted some important but minimalist changes to the Electoral Code, after two and a half years of failed attempts to carry out a full and comprehensive electoral reform.⁷ The amendments were adopted with 106 votes in favor (from the Socialist Party and a part of the MPs of the Democratic Party) and 2 votes against, showing a partial political consensus.

The adopted legal amendments fulfilled the Assembly's obligation to implement three decisions of the Constitutional Court regarding the elections: the completion of the Electoral Code to enable the voting of Albanian citizens living abroad,⁸ changing the electoral threshold formula so that candidates within the lists benefit from reordering from preferential votes,⁹ and the legal threshold for independent candidates.¹⁰ These changes were not subject to the legal process of public consultation and no transparency was made prior to adoption on the prepared drafts. They were only discussed in the Parliamentary Committee for Legal Affairs on July 24 and approved in the last session of the parliamentary session, on July 26, where representatives of all parties accepted the failure of the electoral reform.

Law no. 81/2024, which amended the Electoral Code, detailed the rules for voting from abroad, specifying the CEC's obligations to organize voting by mail and drawing up the list of voters from abroad; determined the obligation of electoral subjects to submit two lists of candidates, one closed with fixed ranking (1/3 of the total) and one open to preferential voting (2/3 of the total); as well

⁶ See KRIIK's Statement "[Setting the date of elections as soon as possible, necessary to avoid putting under pressure the preparatory process and the proper implementation of the law in the 2025 Electoral Process for the Assembly](#)", December 3, 2024.

⁷ KRIIK sent the Special Parliamentary Commission for Electoral Reform the Document "[Recommendations on improving the legal framework for elections, within the Electoral Reform process](#)". KRIIK representatives also observed every session of this Commission and actively participated by proposing recommendations in the sessions held by it. They also met the two co-chairs, and all the experts engaged in the Dialogue Group, to promote the implementation and approval of legal changes.

⁸ Decision No. 38, 09.12.2022 of the Constitutional Court.

⁹ Decision No. 28, 30.06.2021, of the Constitutional Court, regarding the threshold that individual candidates must meet to be ranked according to the preferential vote.

¹⁰ Decision No. 31, 04.10.2021, of the Constitutional Court, regarding the national threshold for independent candidates.

as eliminated the 1 percent legal threshold nationwide for independent candidates. Another important legal change, which was never mentioned in public discussions or those in the Laws Committee, was the mandate of all five members of CSC with a full 9-year term, repealing the article that provided for its renewal with three new members.¹¹

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Some of the amendments of July 2024 are assessed as positive, in particular the elimination of the legal electoral threshold for independent candidates, the elimination of the candidacy of party leaders in several constituencies and the specifications regarding the voting from abroad, which paved the way for the practical fulfillment of this right, recognized de jure since 2020, but not applicable in practice. While it is estimated that the provisions for the 2 lists of candidates, contrary to the spirit of the Constitution, favors the increase in the number of candidates in the closed list and disfavors those in the open list, artificially increasing their number, distributing the support votes of the political subject and artificially increasing the support for the electoral contestants.¹²

In February 2025, the Electoral Code was amended again with Law no. 10/2025, with the main aim of changing some legal deadlines to guarantee enough time for votes from abroad to arrive on time.¹³ Recent changes in the electoral legislation present a repeated concern with negative consequences for the integrity of the electoral process. The adoption of legal changes close to the election date damages the stability and predictability of the legal framework, creating confusion for political stakeholders, the election administration, and citizens.¹⁴

¹¹ The adoption of the July amendments to the Electoral Code by the Assembly was done in a complete lack of prior transparency by not even publishing the prepared draft on the website.

This fact made it possible to pass another change made to the Electoral Code, the repeal of Article 183, which had never been publicly discussed before, and which is essentially a continuation of the cancellation of the Political Agreement of June 5, 2020.

According to point 7 of Article 183 of the Electoral Code, the term of office of the three members chosen by lot of CSC expired on October 5, 2024, so the Assembly would have to undertake the procedure of electing three new members during the month of September 2024.

¹² The Constitution of the Republic of Albania, in article 64 point 3, states that: "The law on elections guarantees that no less than two-thirds of the multiple-name list are subject to preferential voting and ensures gender representation. "While article 67 point 2 of the Electoral Code provides that: "The total number of candidates in the list with a fixed order is equal to the number of mandates for each electoral area divided by three. When this division does not result in a whole number of mandates, then in the event that the decimal point as a result of the division is equal to or greater than 0.5, the list is rounded off with the last whole number, while when the result of the division is a decimal point smaller than 0.5, the multinomial list with fixed order of candidates is closed with the leading integer".

So, in the case of Shkodër District with 11 mandates, an accurate reflection of the constitutional provision would determine three candidates on the closed list and eight candidates on the open list. Meanwhile, with the changes made, there are four candidates on the closed list and eleven candidates on the open list on the ballot.

¹³ Law No. 10/2025 extends the appeal period for voters abroad from 7 to 30 days, determines the obligation of the Albanian state to cover postal expenses for voters abroad, extends by 5-10 days all the main election deadlines (for the registration of lists, the filing of candidates and the deadlines of commissions); grants additional time for airing political advertisements for candidates of open lists of 140 minutes in total from each private media throughout the campaign; sets a ceiling of 3 million lek for the self-financing of each candidate and increases the ceiling of expenses for the election campaign for each electoral subject, excluding candidates, from 3 times to 5 times the highest public funds.

¹⁴ For example, in these elections, while the CEC had approved the Instruction on the rules for the registration of electoral subjects and candidates in January 2025, the legal deadlines were changed by the Assembly in February 2025.

The law marked a step backwards in the intention declared in June 2020 by the political parties to depoliticize the electoral administration, as it determines that the members of the special commissions for counting and evaluating the votes from abroad must be appointed by the political parties, while the CEC had operated until that moment under the correct reading of the law that the persons who would count and evaluate the votes from abroad would be apolitical, an approach positively evaluated and encouraged by KRIIK. Also, the legal changes increased the ceiling of campaign expenses for electoral subjects and eliminated it completely for candidates registered under the logo of a political party or coalition of parties, but not for independent candidates.¹⁵

While it is estimated that the legal framework can generally guarantee elections in accordance with democratic standards, if implemented fully and without equivocation, a number of issues remain unaddressed, such as effective measures to prevent the use of state resources and public office for electoral advantage; effectively addressing vote buying, voter intimidation and guaranteeing the secrecy of voting; the depoliticization of the electoral administration (which is also an obligation derived from the Political Agreement of June 5, 2020); strengthening the effectiveness of the rules to increase transparency and control regarding the financing of the election campaign, the disparity of media coverage of the campaign through non-control of live broadcasts, etc.

The changes in the legislation for the protection of personal data and the instructions of the CEC for the security of voters' information constitute positive developments, but concerns remain regarding the mechanisms of implementation and monitoring of these provisions, especially considering the numerous cases reported in continuity, not only in this election process, for the misuse of voter data.

Electoral system

The 140 deputies of the Assembly of Albania are elected according to a proportional system in 12 constituencies (corresponding to the 12 qarks). For a party to benefit from the distribution of mandates in an electoral district, it must receive at least 1 percent of the votes at the national level. The number of seats for each constituency is determined by the CEC in proportion to the registered population. On December 7, 2024, the Regulatory Commission determined the number of mandates for each electoral constituency for the May 11 elections. Compared to the 2021 parliamentary elections, Korçë lost one seat and Tirana gained one. Seats are allocated among contestants according to d'Hondt's formula.

Each electoral contestant submits two lists of candidates to the CEC for each constituency: a closed and fixed list ranked by the electoral subject and a list open to preferential voting. Seats among the candidates are first allocated according to the order on the closed list and, if the electoral subject has won more seats than the number of candidates on the closed list, the rest are allocated to the candidates on the open list, based on the number of preferential votes won by each candidate.

The law sanctions a gender quota of at least 30% in the lists of candidates, in every three candidates at least one must be of a different gender. In the fixed list of candidates, one in every three names must be from the underrepresented gender; this rule applies even after counting the votes in favor.

¹⁵ For more, see the Section on Campaign Financing.

Administration of elections

The Central Election Commission (CEC) is the main institution responsible for the administration of the electoral process. The CEC managed the technical aspects of the process professionally and generally in accordance with the legal deadlines. A major challenge was voting from abroad, applied for the first time. The CEC generally managed this aspect of the process well, despite the delays in approving by-laws which, even though the law provided for their completion by November 15, 2024, with the changes made to the Electoral Code, were completed on March 20, 2025.

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The CEC consists of three governing bodies: the State Commissioner of Elections and the Deputy State Commissioner of Elections; the Regulatory Commission and the Complaints and Sanctions Commission (CSC). This architecture aims, among other things, to improve the efficiency of the institution as well as to guarantee its independence from political influence. However, KRIIK assesses that the Regulatory Commission showed throughout the process an approach influenced by the agenda of the political parties, which was evident in the members' discussions and their approaches in line with the political parties that have proposed them, in matters where the political parties had a clear position, while for matters where the parties had a neutral position, it was generally voted by consensus.¹⁶ On the other hand, CSC showed throughout this phase of the electoral process a passive and evasive approach, narrowly reading or transforming the interpretation of the letter of the law and its spirit, including basic principles or international standards.

Beyond the administration of the technical aspects of the process, KRIIK assesses that the State Election Commissioner and the administration did not have the same level of engagement in following other elements of the election process that are under the responsibility of the institution. These include the passivity in the supervision of the preparation of the list of voters where the practice of not considering and not treating technical audit reports continued, the ineffective monitoring of the election campaign by the monitors contracted by the CEC (who only reported on minor problems, posters without disclaimers and election offices less than 300 meters from the voting center), while they did not report any problems related to monitoring the use of state resources, behavior of the local administration in the electoral campaign, the behavior of institutions at the local level, monitoring of social networks, and other issues, while there have been more denunciations regarding these elements from civil society organizations.

The most problematic aspect, where KRIIK observed a lack of inherent commitment from the CEC, is the tolerant approach to the use of state resources and public office for electoral advantage, which continued to be a prominent problem in these elections.

Also, in KRIIK's judgment, the attitude of CSC in relation to the adoption of laws which granted benefits to certain categories of the population by the Assembly of Albania is disturbing as they

¹⁶ [Meeting of the Regulatory Commission](#) dated 27.03.2025, in the 27th minute of the video, Mr. Çakaj states that "(...) We know that the first level of election administration is the Central Election Commission. The candidacies, all of us, including the Commissioner, and the members of the CSC are political. Likewise, the second level of election administration sanctioned in Article 29 of the Electoral Code, which is the CEAZ is political, with different political affiliations. Similarly, the third level of the Administration, the Voting Centers Commissions, are political. (...)"

were openly in violation of Article 91 point 4 of the Electoral Code. The decision-making of CSC, overturning the requests of the Commissioner for the suspension of their approval by the Assembly of Albania, undid a very important prevention mechanism sanctioned in the Electoral Code regarding the law-making process, that of favoring and benefiting certain categories of the population in the last and intermediate period of transition until the constitution of the new assembly and the formation of the new government.

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The CEC undertook information campaigns for the registration of voters abroad and educational campaigns for voters, which were addressed to the general population, national minorities¹⁷ and persons with disabilities. The awareness campaign carried out regarding criminal offenses in the field of elections was limited, focusing only on the offenses regarding the behavior of citizens, but not on that of public officials in relation to the electoral process, which can eventually be seen and denounced by citizens.

The Regulatory's decisions on important issues were often taken late and after internal, non-public debates, showing the political pressure on the Commission. This political influence was most evident in the case of the delay in the approval of the act for the counting and evaluation of votes abroad, the failure to adopt meaningful changes in Decision no. 9/2020, the failure to adopt amendments to the act related to the granting of the right to register in PER to Albanian citizens who did not have an Albanian identification document, the failure to extend the voting time on election day in Vlora requested by the Socialist Party, as well as other issues which implied a certain position of the main political parties. On the other hand, KRIIK appreciates the amendment of several regulatory acts to prevent the influence of voters during election day by unauthorized persons and the efforts to improve Decision no. 9, despite the fact that what was changed focused only on the changes related to the reporting of institutions in the reporting interface.

Regarding CEC's operation transparency, KRIIK commends the online publication of the documents received and sent by the institution, although with some problems in access and completeness of the documentation. Also, the continuation of the practice of cooperation with civil society organizations and international observers is positively evaluated. However, it is worth noting that the decision of the CEC to completely improve and change the website of the institution during the election period was a decision that harmed transparency, as the site was not fully functional all the time, access to the documentation was more difficult, the search engine on the site was almost non-functional, a number of previous acts of the CEC were impossible to access, etc.

The institutions' reporting interface (NRI) for the institutions' activities during the period four months before the elections was built and put into operation, initially for testing on January 11, when the application of the institutions' reporting mechanism had begun. This interface should have been fully functional on January 6, 2025, when institutions would have to start reporting on activities that would eventually be realized on January 11, 2025. KRIIK estimates that the new

¹⁷ In Greek, Romani, Macedonian, Bosnian, Serbian, Montenegrin, Bulgarian and Aromanian languages.

platform had some positive aspects compared to the one used in the previous elections.¹⁸ However, there were steps backwards in some of its elements.¹⁹

The mechanism of evaluation of these reports by the CEC, in summary with a weekly frequency, starting administrative investigations in some cases even for activities that had already taken place, and focusing only on statistics is considered ineffective. The reporting by the institutions continued to be incomplete, placing in the mandatory fields only words that did not always provide the required information or provided it so basic that it did not allow to understand the content of the activity. As a result, it is estimated that the institutions' reporting mechanism continued to be formal, both from the reporting institutions and from the CEC itself.

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Contrary to good practices, political parties can replace or change the members proposed by them in the second and third level election commissions at any time during the election cycle, without having to justify their decision, which damages the stability of the election administration.²⁰ Even in this process, this problem continued to remain the same. The membership of CEAZs was highly changed even a day before the election day. Regarding the membership of the polling stations commissions, the problem of fictitious appointments by the Commissions of Election Administration Zones (CEAZs) to respect the legal deadline, and the subsequent changes, even on the day before the election day, continued.

Challenge remains the depoliticization of the electoral administration and the strengthening of public trust in the complete independence of the CEC as a guarantor of the integrity of the electoral process.

Voting of Albanians living abroad

The July 2024 amendments to the Electoral Code stipulated that the CEC Regulatory Commission had to approve bylaws by November 15, 2024. However, this process was completed with considerable delay, only on March 20, 2025.

Despite the lack of a complete legal framework and political debates on the necessary changes, the process of preparation of bylaws included consultations with civil society organizations, demonstrating a highly cooperative approach by the CEC.

Registration in the Electronic Registration Platform (PER) took place from January 11 to March 9, 2025, despite requests for a deadline extension by the Democratic Party. In total 245,953 voters

¹⁸ The option to automatically ban from the platform activities that are reported out of time, an earlier recommendation of KRIIK, was a positive step.

¹⁹ In the new platform it is impossible to save a specific event as events do not have unique urls, so re-finding or referencing a specific event is extremely difficult. Also, although there was an effort to increase transparency by enabling the download of the event database in tabular format, an element that was also included in the legal framework, the file could only be downloaded in MS Excel format, and not all fields of the database could be downloaded, making the downloaded document incomplete and inefficient.

²⁰ Code of Good Practices in Electoral Matters, of the Venice Commission, paragraph II.3.1.f., page 10: "The bodies appointing members of electoral commissions must not be free to dismiss them at will."

registered, while a number of applications were rejected due to problems with address documentation.²¹ Six citizens were registered after complaining to the court.

The distribution of voting materials was carried out between April 10 and 23, but the process was accompanied by irregularities by the postal company, including: non-delivery of envelopes in person, envelopes without ballot papers, communication problems with the company and unauthorized subcontracting to another operator in Greece.

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Initially, the problems were reported on social networks and by political parties. To address the situation, the CEC created a reporting mechanism in PER and asked the postal company for official clarifications. The difficulties were particularly pronounced in Greece.

Despite the challenges, about 79% of registered voters managed to exercise their right to vote, with envelopes arriving within the legal deadline.

Technical preparations for diaspora voting, voter registration and electoral education proceeded as planned, with delays that can be considered justifiable given the complexity of the process and the fact that it was being applied for the first time. KRIIK assesses that despite the challenges that accompanied this first implementation, the diaspora voting process was carried out with efficiency, transparency, and professionalism by the Central Election Commission.

Voter registration

Albanian citizens who have reached the age of 18, including on election day, enjoy the right to vote. Contrary to international standards, persons who have been declared mentally incompetent by a final court decision are excluded from this right.²² Also, individuals convicted of committing a crime, by final decision, according to the types of criminal offenses defined by the so-called Decriminalization Law, do not have the right to vote.

Voter registration is passive, based on the civil registry, while voters abroad followed an active registration process, which required submission of specific documentation and proof of foreign residence address. Also, voters over 100 years old are eliminated from the list of voters *a priori* and should formally request to be included in it again.

For voters within the country, voter lists were automatically updated from National Civil Registry data. The Ministry of Interior reported a total of approximately 3.7 million registered voters, of which approximately 246,000 registered abroad. The process of verifying the lists by citizens was facilitated through an online platform, which allowed the control of personal data and the polling station.

²¹ See the Section on Voter Registration for more.

²² See Article 29, para a of the [Convention on the Rights of Persons with Disabilities](#): "States Parties shall guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others, and shall undertake to [...] Ensure that persons with disabilities can effectively and fully participate in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for persons with disabilities to vote and be elected."

On the website of the CEC there are five audit reports from two auditors. One of the auditors has presented four reports where he presents the findings both for the compilation of the voter list inside the country and for the electronic voter registration system abroad (PER). The other auditor has presented only a report on the PER system, but not on the verification of the actions in the database of the National Registry of Voters and the compilation of the list of voters within the country.

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Auditor Laert Kraja's four reports on the voter list repeatedly identify structural problems affecting the integrity and accuracy of electoral data. The most frequent findings include multiple voter registrations, inconsistencies in declared addresses with real residences, and uncoordinated distribution of voters to different polling stations, even when voters are within the same household. It highlights weaknesses in the control and cleaning of data by the responsible structures, emphasizing the lack of a reliable mechanism for the accurate verification of civil and electoral information. Despite these problems, he appreciates the gradual improvements that have been made during the audit phases, such as the correction of duplications by General Directorate of Civil Status (GDSCS), the improvement of the technical infrastructure and the inclusion of user recommendations in the PER system (such as additional functions and a clearer interface for operators). Also, this audit has reported an overlap of 127 voters, who according to him were included both on the list of voters inside the country and on the list of voters abroad. In addition, according to the audit research, there were 133 citizens who have left Albanian citizenship but are still on the voter lists. In fact, according to him, it appears that five citizens, who, although have left their Albanian citizenship, managed to register in PER.

Auditor Ervin Bana's single report on the PER system focuses mainly on aspects of cyber security, data management and operational sustainability of the electronic voter registration system.

It remains worrying that the CEC continued not to publicly review any of the technical audit reports, despite the problems they contain, but it only forwarded the reports to the GDSCS.

The written notification of the voters again in this election process as not conducted by the responsible institutions (Municipalities), as well as by the lack of supervision of the process by the Ministry of Interior and the CEC. KRIIK again raises the concern that this step of the process is extremely important and should have been checked and supervised by the Ministry of the Interior and the CEC. This not only implies non-implementation of the law by the institutions but also financial costs in the state budget, given that the Ministry of the Interior allocates a special fund for each municipality for the implementation of this process.

For voters abroad, the registration process presented significant challenges. From the total of 365,166 requests for registration from diaspora made by 294,155 voters, 245,975 voters were registered as voters from abroad, and the request of 48,180 voters was rejected. The main reason for the rejections, according to the CEC, was incomplete proof of address documentation. The high rate of refusals raises questions about the effectiveness of the legal provisions that enable voting from abroad.

An online complaint mechanism for citizens living outside the territory of Albania was created at the Tirana District Court. For six citizens who appealed to the Court, the latter decided to grant

them the right to vote, a process which was followed by the Commissioner's decision-making for their inclusion in the list of voters from abroad.

Registration of electoral contestants and candidates

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Albanian citizens who have reached the age of 18 by the day of the elections can be elected to the Assembly, except for those who are excluded from this right based on the so-called Decriminalization Law. Some categories of public functionaries cannot be elected deputies in the Assembly of Albania, without first resigning from the current position.²³

Positively, the revised legal framework prohibits running in more than one constituency for leaders of political parties and eliminates the national threshold for independent candidates, aiming to increase access to the electoral process for individuals outside traditional party structures. However, no independent candidate was registered for the May 11 elections.

The internal transparency of the parties in the selection of candidates continued to be problematic. The parties do not conduct public consultations on the lists, do not publish criteria for the selection and do not have internal democratic procedures or processes verifiable for the public in the selection of candidates, or of their selection in the reconciliation with the concretization of the electoral and governing programs they present. This situation contributes to the perception that the lists are the result of clientelist agreements or political patronage and not of merit or citizen support. The Democratic Party applied a primaries system in these elections, where candidates were voted on by the party membership before the lists were compiled, however the results of the primaries had little influence on the selection of candidates who were included in the lists. While the Socialist Party applied in a totally closed way a broad representation of categories from social groups aiming simply to maximize votes in its favor.

Each party or coalition registered with the CEC must present a multi-name list in all electoral districts. Parties or coalitions whose comprising parties do not hold seats in the Assembly must be supported by at least 5,000 voters for parties and at least 7,000 for coalitions; exceptions are those coalitions where the comprising parties jointly have at least as many seats in the Assembly as the number of parties in the coalition. The existing parliamentary parties do not need to show their support through signatures, but a document from the Assembly of Albania proving the possession of the mandate is sufficient. Groups of at least nine voters can propose a candidate for a district. Independent candidates must secure the prior support of at least 1 percent of voters in the electoral district where they will run, but no more than 3,000 endorsement signatures.

The deadlines for submitting the lists were changed with the February 2025 legal changes from 50 days to 60 days before election day. KRIIK assesses that, despite the fact that the purpose of changing the deadlines was necessary to guarantee enough time for votes from abroad to arrive on time, changing the rules for the registration of candidates in the middle of the election period is a negative practice that should be avoided. These last-minute changes are a clear sign of the lack of

²³ These categories include judges and prosecutors; military personnel in active service; police and national security service employees; diplomatic representatives; mayors, municipalities and prefects in the areas where they exercise their function; members and chairmen of election commissions; as well as the President of the Republic and senior officials of the state administration, determined by a special law.

seriousness and foresight of the political class and the Assembly during the amendment of the legal framework for the elections in July last year.

The July 2024 amendments changed the way lists are presented, parties must submit two lists, one-third of the candidates on a closed list with fixed ranking and two-thirds on a list that is reordered after the voting based on the preferential votes the candidates receive. KRIIK assesses that this system, despite being a step forward compared to the high threshold that was required for re-ranking with the system applied in 2021, still gives the party leader considerable control over the final ranking, especially for safe seats, discouraging competition and limiting the opportunities of candidates who are not part of the narrow circle of party leaders.

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In the elections of May 11, 2025, ran eleven electoral contestants,²⁴ of which three coalitions, and 2,046 candidates²⁵ included in their lists. One-third of the candidates for each district were included in the closed list of each subject, while the number of candidates included in the open list was the same as the number of mandates in the respective constituency.

Four electoral contestants²⁶ were registered after presenting supporting signatures since they did not have seats in the Assembly of Albania, six held seats. The "New Democracy Alliance" party was registered in the elections as a parliamentary party, bringing confirmation from the Assembly of Albania that it had a seat. From the verification made on the official website of the Assembly, this party does not appear as a parliamentary party, again evidencing the incorrect and meaningless provision of the relevant provision in the Electoral Code regarding the consideration of an existing deputy in the Assembly as part of another non-parliamentary political force, for the effect of its registration in the elections and avoiding the collection of supporting signatures from the latter.²⁷

The deadline for the registration of candidates was March 12, 2025. Only the "Together Movement" party filed the multi-name lists of candidates before this date. All others submitted their lists to the CEC close to midnight on March 12. Submission of incomplete candidacy documentation to the CEC continued to remain a fundamental problem. The lists were submitted incomplete to respect the legal deadline, but without full relevant required documentation, which puts a question mark on the entire selection process within the political parties for the placement of candidates on the competing lists and making this process mostly fictitious.

The legal framework only provides for the right to correct candidacy documentation by the electoral subjects within 48 hours if it is considered incomplete by the CEC. Even this correction

²⁴ In total, 53 political parties were registered in the CEC. After the formation of the coalitions, 26 parties were grouped in the "PD-ASHM" Coalition, 3 parties in the "Initiative Albania Becomes" Coalition and 2 parties in the "Right for Change" Coalition. Eight political parties competed alone without joining coalitions. Meanwhile, fourteen political parties, despite being registered, are not considered electoral subjects as they did not submit lists of candidates to the CEC.

²⁵ Of which 792 women.

²⁶ The "Together Movement" party, the "Initiative Albania Becomes" coalition, the "Homeland Movement" party, the "Albanian National Alliance" party.

²⁷ Article 68 "Supporting lists of political parties and coalitions" of the Electoral Code, point 3 "For the purpose of this article, the political party or coalition submits a written certificate, signed by the institution of the Assembly or the local government unit, which proves the possession of the mandate at least 6 months before the end of the mandate of the Assembly or the body of the local government unit, based on the self-declaration of the holders of the mandates for belonging to the political party, to the relevant institution."

procedure can only be carried out after a decision of the CEC for this purpose. During the registration process in these elections, this procedure was exceeded by the CEC, giving the political parties the right to make any substantive changes they wanted beyond the deadline set by the law. This space was maximally used by the electoral subjects to make changes in the list of candidates' names, which is against the law. It turned out that the CEC did not make any decision on returning the documentation for completion, but only allowed the changes requested by the parties.

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The CEC is the competent body for the administration, verification, implementation of prohibitions for election and appointment in public office, which includes the function of the deputy. In this context, the CEC carried out the verification of the self-declaration forms of the candidates. Sixteen candidates were sent for in-depth verification to the General Prosecutor's Office. Even in this verification process, the official communication of the CEC with the GDCS continued to remain problematic. It is noted that during the verification, only the General Directorate of Prisons has responded to the CEC, while the GDCS has not.

Election campaign

Campaign environment

While according to the Electoral Code the election campaign starts 30 days before the election day, even in these elections, the political parties de facto started it long before the deadline. The lack of a clear legal definition of what constitutes an election campaign, combined with the lack of an unequivocal prohibition in the legislation of conducting the campaign before it has officially started, creates the possibility for electoral subjects to bypass the legal provision and start the campaign earlier.

This already consolidated practice raises strong questions about the reason for the existence of a legal norm that is continuously violated by political parties, while there is no action by the institutions responsible for stopping this phenomenon.

The election campaign officially began on April 11, 2025, and took place in a climate of deep political polarization. Campaign activities were characterized by harsh rhetoric, personal attacks between party leaders, and a lack of substantive debate on public policies and government programs. These phenomena were manifested both in traditional campaign activities and in online platforms and social media.

Allegations of voter corruption and vote buying, in various forms (in exchange for a monetary reward or other material goods) have been numerous. Tensions or conflicts between sympathizers have also been present.

According to official information from the State Police, the structures set up by it to investigate election crimes referred 37 cases of election crimes to the General Jurisdiction Prosecutor's Office and SPAK.

Meanwhile, 54 criminal reports were referred by the General Prosecutor's Office, of which 23 were registered as criminal proceedings for criminal offenses in the field of elections provided for in articles 325/2 of the Criminal Code.

The campaign was dominated by political leaders at the central level, leaving little or no room for candidates.²⁸ Page | 18

Abuse of state resources and public office for electoral advantage, the mixing of institutional activity with political activity, the adoption of legal or by-law acts explicitly prohibited by the Electoral Code, the use of official pages on social networks of institutions or even the development of electoral activities within public institutions continued to be present to a significant extent, despite clear legal prohibitions. KRIIK observed inaction on the part of the CEC regarding addressing this problem.²⁹

Problems with the use of state resources include initiatives for fiscal relief or forgiveness of fines from the central and local administration during the campaign period, participation of public officials in campaign activities during official working hours, presentation of public projects as party achievements, disrupting institutional neutrality, and others. What is considered more problematic is that in almost all official activities, for an outside observer it is often impossible to understand whether the activity is of an institutional or electoral nature, since the rhetoric used is the same and the communication has an ongoing electoral nature, blurring the dividing line between the party and the state.³⁰ Prime Minister Rama's rounds of meetings throughout the campaign had this character, where the only distinguishing sign if the meeting was of an institutional or electoral nature was often only the presence or not of electoral symbols of the Socialist Party, since the Prime Minister in most of the activities, called institutional, wore clear party and electoral clothing and symbols. There were also institutional activities where the presentations used carried the colors or slogans of the Socialist Party.

The challenge and the open disregard for the regulations and legal ban on non-use of public resources for electoral effects remain very disturbing. It was found that the ruling majority approved laws and by-laws, which provide clear benefits for certain sections of the population, on calendar dates before January 11, when the legal prohibition period began, but clearly calculating that the application and implementation³¹ happening in the four-month period of prohibition before election day, which includes them *in fact* all these acts in violation of the law and the constitutional and international principle of equality in elections. The interpretation made by the Administration of the Assembly or some Ministries of the prohibitions provided by the Electoral Code, in response

²⁸ According to the data from the monitoring of the coverage of the election campaign by the Audiovisual Media Authority, more than 50% of the media coverage time for the election campaign was coverage for the leaders of the two main parties participating in the elections, SP and DP, respectively Mr. Edi Rama and Mr. Sali Berisha.

²⁹ For more see the Section on Election Administration.

³⁰ According to paragraph 5.4 of [The Copenhagen Document](#), participating states commit to "a clear separation between the State and political parties; in particular, political parties will not be merged with the State."

³¹ The most explicit cases are the spring bonus for retirees, the application for soft or zero-interest loans for the state administration, etc., as well as the approval of Law No. 127/2024 dated 19.12.2024 and, following it, the issuance of the Council of Ministers Decision on May 9, 2025 for the forgiveness of unadministered fines. This, as Law No. 127/2024 entered into force on January 15 and provided for the approval of the Ministry of Internal Affairs by January 25, 2025.

to the denunciations made to the CEC, is found to be deliberate in the misreading and misinterpretation of the law.³² The deliberate non-implementation of the Law on the creation of the denunciations window on the official websites of state institutions to give citizens the possibility of denunciations against the misuse of public resources of that institution or the involvement of its employees in party or electoral activities prohibited by law, as well as the refusal of the Order of the State Election Commissioner to fulfill this legal obligation within 48 hours, is considered a challenge and a clear illegal position of the institutional and personal will of the respective Heads of over 190 state institutions not to implement the legal regulation and enforcement mechanisms in order to prevent the misuse of public resources.³³ The continuation of the use of concerts and entertainment cultural shows during or in the function of the election campaign, especially by the Socialist Party, in open opposition to the prohibitions of point 9 of article 78 of the Electoral Code, constitutes again a continuing and challenging approach of the majority to the law.³⁴

Online campaigning took on an increasingly important role in these elections but remains largely unregulated in law. On March 25 of this year, six political parties, including the SP and the DP, signed the Code of Ethics in the electoral campaign. Despite its approval, there were cases of misinformation and personal attacks, especially on online platforms. A significant challenge to the effectiveness of the Code of Ethics lies in its voluntary nature and the lack of formal enforcement mechanisms. In this campaign, the use of video creations, photos, etc. for campaigning through artificial intelligence, generally satirizing and attacking the political opponent, but often going into ethical violations.

Particularly problematic was the language used during the campaign by the Prime Minister and the Chairman of the Socialist Party, Mr. Edi Rama, who used various labels³⁵ towards the opposition, or even discriminatory comments.³⁶ The focus of media attention on party leaders, combined with the lack of internal democracy in Albanian political parties, means that their language choices and communication styles shape the tone and essence of political and electoral discourse, potentially influencing the language used by other candidates and supporters of the respective parties, or even public discourse in general.

³² See [KRIIK's denunciations](#) and the violations made in the CEC by these institutions.

³³ See [Denunciation no. 27](#) and [Denunciation no. 28](#) of KRIIK.

³⁴ See [Denunciation no. 17](#) and [Denunciation no. 18](#) of KRIIK and the violations made in the CEC by these parties.

³⁵ During his speeches, the leader of the Socialist Party used labels such as "men are çyryke (term meaning stupid)", then the men who go after the "swamp owl" (referring to the DP leader Sali Berisha), are çyryke. Also unacceptable is his statement about the context and reality in the country through the statement that "who goes after the swamp is politically autistic", etc.

³⁶ A key provision of the Code is the commitment by signatories to refrain from producing or disseminating discriminatory statements based on various characteristics. Prime Minister Rama's use of terms such as "men çyryke", "furry people" and "autistic", in the opinion of KRIIK, constitutes a violation of this Code, especially of the clause prohibiting discriminatory statements against people with special abilities.

Although the gender quota (a minimum of 30% for each gender on candidate lists) has been formally respected, women candidates continue to face inherent barriers, including uneven media coverage and lack of campaign funds.³⁷

The election campaign ended on Friday, May 9. Article 3 of Instruction no. 6 dated 23.03.2021 of the State Election Commissioner determines that, with the end of the election campaign, the election subjects take measures to remove all propaganda materials. Despite this legal ban, on May 10 of the election silence, numerous cases of electoral promotions were still present on social networks, portals, as well as static materials on city lights or banners.³⁸ Advertisements on social networks continued to be active even on the day of the elections; some electoral subjects had active advertisements which were activated on May 10 or even 11, in obvious deliberate violation of the Electoral Code.

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Overall, the election campaign showed that despite improvements in the legal framework, problematic practices such as the use of state resources, lack of transparency in funding, and negative rhetoric continue to undermine the integrity of the process and limit voters' ability to make well-informed decisions.

Campaign finance

Electoral entities can be financed from public funds for parties that have passed the threshold of 1 percent of votes in the previous elections; own income; private donations in money, in kind or services, where any physical or legal donor can donate up to 1 million ALL per subject; and loans. The total expenses of the electoral subject, excluding its candidates, cannot exceed five times the highest amount that an electoral subject has received from public funds. Private donations can only come from Albanian individuals and legal entities, with a limit of 1 million ALL per donor, while transactions over 50 thousand ALL must be documented through the banking system.

Candidates on party lists can self-finance up to 3 million ALL and accept gifts up to 1 million ALL per donor, with no general limit on the total amount they can benefit or spend. This after the last changes made in February 2025, which determine that the campaign expenditure ceiling for each electoral subject does not include the expenses of the candidates of the respective subject. These changes leave open the possibility that a candidate registered under a political party can spend much more than an independent candidate (for whom the spending ceiling is 50 percent of the largest amount that an electoral subject has received from public funds), creating a marked disparity in favor of party candidates.

³⁷ KRIIK has collected the minutes of the media coverage of the election campaign, based on the daily media monitoring reports from the AMA as well as the expenses incurred by the election subjects on Facebook and Instagram, with data from Meta's Political Ads Library. According to data from the AMA, about 85 percent of media coverage has been for men and only 15 percent for women. Meanwhile, men spent about 80 percent of the amount spent on political ads on Facebook and Instagram.

³⁸ For more see the [Denunciation](#) of KRIIK dated May 10 regarding the breaking of the election silence.

Election campaign financing continues to present significant transparency and control problems. The lack of interim reporting and effective mechanisms for monitoring third-party financing creates opportunities for violations of the rules.

The monitoring of the campaign by the monitors contracted by the CEC does not enable the verification of campaign costs while it takes place, and this makes it almost impossible to verify the reports of the political parties after the campaign. Besides this, this whole mechanism continued to be inefficient even in this electoral process. Besides the fact that the monitors were appointed within the legal limits, their training was also incomplete. From the reports it is evident that the violations recorded by the monitors are only related to the propaganda materials produced without the inscription "produced under the legal responsibility of..." and to the opening of electoral offices at less than 300 meters from the polling stations. There are no reports of violations related to the misuse of public resources in the function of electoral campaigns, non-fulfillment of legal obligations in relation to the electoral process by the administration at the local level, monitoring of social networks, etc.

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KRIIK monitored election campaign spending on Facebook and Instagram and recorded some \$220,000 in spending from the day the election date was set until May 4, 2025, not including the last week of the campaign. The Electoral Contestant with the highest expenses was the "Democratic Party - Alliance for Great Albania" Coalition, followed by the "Opportunity Party", the "Socialist Party of Albania", the "Euro-Atlantic Coalition" and the "Albania Becomes Initiative" coalition.³⁹

Media

The media environment during the election period reflected structural problems that have characterized the Albanian media in recent years. Media independence is undermined by the concentration of ownership and the economic dependence of media owners on public tenders and government-linked business interests. This situation has contributed to self-censorship and one-sided coverage of the election campaign by many traditional media.

The legal regulation of campaign media coverage introduces significant disparities between electoral subjects. The Electoral Code gives parties that won over 20% of mandates in the previous elections twice the media coverage compared to other competitors. This provision, although partially justified by the representative importance of the major parties, creates unfair advantages in media access and harms political pluralism in public space.

Monitoring the media coverage of the campaign showed a clear predominance of the two main parties (SP and DP) in news editions and political programs. Smaller parties and independent candidates received minimal coverage, limiting their ability to present political alternatives to voters. Quantitative analysis of television airtime monitored by the AMA throughout the election

³⁹ "PD-ASHM" coalition about 87,000 USD; "Opportunity Party" some 40,000 USD; "Socialist Party of Albania" some 30,000 USD; "Euro-Atlantic Coalition" some 28,000 USD and the coalition "Initiative Albania Becomes " some 18,000 USD. All figures are as of May 4, 2025.

campaign⁴⁰ show that some 90 percent of the media coverage was for the election contestants "Democratic Party - Alliance for Great Albania" and "Socialist Party of Albania". This fact becomes even more problematic if it is considered that the coverage proportions are the same in the channels of the public Radio Television, RTSH.

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Regarding the type of coverage, AMA's monitoring shows that most of the media coverage (some 44 percent)⁴¹ was in the form of live broadcasts of the events of the political parties, live broadcasts which are made available to the media from private studios contracted by the political parties. It is emphasized that these live broadcasts are impermissible and totally contrary to the Electoral Code, deeply distorting the equality that the legal regulation provides for the coverage of the campaign by the audiovisual media, which neither the AMA nor the CEC have addressed or raised, at least, as a concern.⁴² While special informative political broadcasts have occupied about 33 percent of media coverage of the election,⁴³ news editions about 22 percent⁴⁴ and advertising less than 1.4 percent.⁴⁵

Regarding the monitoring methodology of the AMA, the fact that it only conducts quantitative monitoring of media coverage remains problematic, which makes it impossible to assess neutrality of the media. Also, the fact that only 28 of the 45 monitored media outlets were monitored all the time remains extremely problematic.

Online media and social media platforms have provided an alternative space for information and political debate, but it is found that these too have been subject to manipulation, misinformation, and breach of ethics.

Complaints and appeals

The system of addressing electoral complaints in Albania is structured through a two-level mechanism, which includes the Complaints and Sanctions Commission (CSC) at the CEC and the

⁴⁰ During the campaign, the AMA monitored 45 audiovisual operators (radio and TV). Of these, 28 were monitored all the time and the rest partially.

⁴¹ There are 70,714 minutes of "Live" broadcast from a total of 160,936 minutes of media coverage.

⁴² The Electoral Code stipulates that the election campaign can be reflected on the State Radio and Television only through: 1) news; 2) informative programs; and 3) free political advertising. RTSH makes free minutes available to registered political parties to campaign. (*articles 80 and 81*).

Likewise, the Electoral Code provides that the election campaign can be reflected on Private Radios and Televisions only through: 1) ordinary and special informative editions; 2) election debates between political parties or competing candidates, maintaining the balance between political parties; and 3) paid political advertisements only for electoral subjects registered for elections. Private Radio and Television stations do not make free airtime available to registered political parties for campaigning. (*Article 84*).

It turns out that the live broadcasts of the electoral activities of the parties do not constitute either "informative editions", which have a special arrangement of broadcast time, nor "electoral debates". They can be considered to constitute only "Political Advertising", for which a limited time is provided, while the relevant broadcasting expenses must be declared in the CEC, according to the rates of the relevant media deposited in the CEC.

⁴³ 52 680 minutes of broadcast are found out of a total of 160 936 minutes of media coverage.

⁴⁴ 35,307 minutes of broadcast are found out of a total of 160,936 minutes of media coverage.

⁴⁵ 2,233 minutes of commercial airing are counted out of a total of 160,936 minutes of media coverage.

Electoral College at the Tirana Court of Appeal. For some issues, the appellants can turn to the administrative courts.

Political parties, candidates proposed by voters and other interested entities can challenge the decisions of the CEAZs and the CEC that affect their legitimate interests. Deadlines for submitting appeals vary from 24 hours to 5 days, depending on the nature of the decision. Subjects who have been denied registration as participants in elections or for the accreditation of observers also have the right to appeal. Electoral subjects have the right to appeal to the Electoral College of the Tirana Court of Appeal against the decisions of the CEC, when they violate their legitimate interests. Individuals or political parties, whose request for registration as an electoral subject has been rejected, also have the right to appeal.

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Out of a total number of 194 complaints filed with the CEC for violations of the electoral law,⁴⁶ of which about 55 from civil society organizations and 125 from the Democratic Party, and the others from individuals or whistleblowers, the State Election Commissioner proposed to CSC the imposition of sanctions for only four cases, of which CSC imposed administrative sanctions for two, the object of which was the non-reporting of institutional activities. For 107 cases, the SEC decided not to start or suspend the administrative review after it had started.⁴⁷ In two cases, the SEC proposed to the Assembly not to introduce laws denounced by KRIIK into the procedure, in two cases it ordered the removal of propaganda materials or the closing of electoral offices established in violation of the law, and in three cases it drew attention to the denounced entities.

During the pre-election period, CSC has handled 21 complaints related to various aspects of the process, complaints about the use of state resources for electoral advantage, about the decisions of the SEC on the closing of election offices and/or the removal of propaganda materials, about the content and form of the ballot, the establishment of the Voting Centers in penitentiary institutions, the registration of an electoral subject, etc. Most decisions related to the examination of issues adopted by a vote of 5 to 0. What remains problematic, in the judgment of KRIIK, are the divisions in the vote of 3 to 2, always having the same members for and against in the consideration of issues⁴⁸ for which it is estimated that there is a political influence or interest. This element is clearly present during the public hearings for the administrative review. The decisions taken by CSC, regarding the acts of the Assembly as acts undertaken for the purpose of electoral gain, are considered a narrow and deliberately transformed reading of the content of the letter and spirit of the Electoral Code, undermining the credibility of the appeal process in the face of the appeals by the socialist majority.

For the first time in these elections a **task force was created by the CEC, General Prosecutor, and SPAK**, a very positive approach encouraged and constantly requested by KRIIK.

The Special Structure Against Corruption and Organized Crime (SPAK) has undertaken positive initiatives to address election crimes, including the creation of a task force dedicated to the

⁴⁶ According to the data received from the CEC administration.

⁴⁷ The SEC decided not to start the administrative procedure for 37 denunciations and to suspend the administrative review for 70 cases.

⁴⁸ The issues for which the decision-making of the CSC has been by a majority of votes, 3 to 2, are the issues where the party in the process was the Assembly of Albania, the Speaker of the Assembly of Albania, or the PD-ASHM Coalition.

investigation of election violations and an online platform for reporting these cases. However, the effectiveness of these mechanisms in practice remains unclear.

During election day, the CEC referred to the Prosecutor's Office⁴⁹ five cases of criminal offenses related to pressures on the commissioners, photographing the ballot and multiple voting.

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SPAK publicly announced the statistics of referrals and criminal investigations initiated by it after election day.⁵⁰

Election day

On election day, KRIIK engaged 38 observers who voluntarily monitored some elements of voting in a limited number of polling stations, with a particular focus on meeting the criteria for secret, intimidation-free and peaceful voting in the vicinity of polling stations. The observers reported in real time on the development of the process, including the observed irregularities. The observers engaged by KRIIK have considerable domestic and international observation experience.

Election day was generally peaceful, but with sporadic incidents. In some of these incidents, senior political officials were involved.⁵¹ A very problematic situation was created in the Vorë Municipality, where the CEC decided to cancel all the accreditations issued by the CEC for election observers, after the conflicts that occurred.

As in previous elections, although somewhat less obvious at first glance, the main problem of election day continued to be the presence of unauthorized persons in the vicinity of polling stations or their surroundings, which constitutes the continuation of patronage, influencing and intimidation of voters. Despite the changes and improvements in the regulatory framework by the CEC, it seems that there was no change, except for the care to be less visible. According to reports in the CEC, the mechanism of the security coordinator⁵² in polling stations seems not to have been implemented.

⁴⁹ Two cases in Tirana, one case in Elbasan, one case in Berat and one case in Korça.

⁵⁰ Out of 156 administered materials, of which 39 have passed the investigation stage, so they have been registered as criminal proceedings. One case was initiated on the basis of referrals from the State Police, 1 was referred by the Internal Control Service of Prisons, 8 were initiated mainly by SPAK, 3 came as a result of reports from various citizens, 3 were referred by the Prosecutor's Offices of Judicial Districts and 3 were based on the reports of political subjects.

⁵¹ The Secretary General of the Democratic Party, Mr. Flamur Noka was involved in an incident in Vora Municipality. Also, in the area near the voting centers at the "Petro Nini Luarasi" school, DP denounced a secret electoral office of the candidate Erion Braçe where, according to DP, illegal actions were being carried out. Clashes and discussions between the parties caused tension in the area, which led to the police being called and the case being referred to the Prosecutor's Office by the DP.

⁵² - Regulatory Commission, Decision No. 24, dated 21.03.2025, "On some additions to Decision No. 11, dated 25.03.2021, "On the manner of setting up, organizing, and operating the voting center committee and conducting elections in the voting center", as amended".

- Regulatory Commission, Decision No. 25, dated 27.03.2025, "On some changes and additions to Decision No. 12, dated 30.12.2020, of the Regulatory Commission "On the approval of the rules of the State Police in the service of elections".

- Order of the State Election Commissioner "On order and security in the facilities where the voting centers are located, as well as around them, for the Assembly elections on May 11, 2025", dated 04.15.2025.

This phenomenon directly undermines the secrecy of the vote, creating an environment where voters feel constantly watched and exposed. Although the technicalities of voting inside the polling stations can be respected with maximum scrupulousness, the feeling of intimidation created by this political patronage affects the real freedom of voters, since voters who perceive that their choice can be identified or monitored can change their electoral behavior under psychological pressure.

In a significant number of cases, unauthorized persons were standing near the polling stations or in public areas in their vicinity, mainly coffee shops. This allowed them to have complete information on the people who showed up to vote. This, combined with the information that almost all members of polling station commissions or accredited political observers gave about voters, made it possible for the representatives of political parties to have complete information about who showed up to vote and who did not, thus violating the secrecy of the vote.⁵³ Another element, which seems to have been applied by the commissioners to support this mechanism, was the direction of the voters to sign the list of voters, despite the fact that they were identified electronically. According to the law, the voter signs the list of voters only if he is on this list and it was not possible to identify him electronically.⁵⁴

Other problems consisted in the low level of preparation of the members of polling stations commissions, ballot photographing, family voting, technical problems of the malfunctioning of the Electronic Identification Device (EID), etc.

KRIIK observers noted different levels of preparation and knowledge about the process on the part of the commissioners; in some areas, the level of knowledge and preparation was significantly low.

According to the representatives of the CEC, the presence of polling station commissioners in the training conducted was low, which, in combination with their changes at the last moment, could be one of the main factors for their lack of knowledge and inadequate preparation.

The Electronic Identification Device worked without problems in most of the observed VCs, with some problems, such as fingerprints not being recognized, blocking, or malfunctioning of the device.

The environments of the polling stations, in most of the polling stations observed, were not suitable for access by Persons with Disabilities.

Despite the official request from the Socialist Party, to extend the voting schedule in the Vlora Municipality due to movement restrictions for citizens during the election day, all polling stations were closed at 19.00. To extend the voting schedule in Vlora, one of the members of the Regulatory Commission requested a meeting of the Commission. The commission met on the afternoon of the election day but did not reach the necessary quorum to start the meeting to

⁵³ See the [Statement of KRIIK](#) "The active participation of all citizens throughout tomorrow's election process and the full and efficient implementation of the Law by institutional actors, a vital necessity for the country's democratic standards", dated 10.05.2025.

⁵⁴ Regarding this issue, the representatives of the CEC who conducted the training said that the commissioners were trained and instructed not to force voters to sign the list of voters if they were identified by the PEI.

consider this proposal, since two of its members, Mrs. Vukaj and Mr. Çakaj, rightly according to KRIIK, considered such a decision inappropriate, in view of the competence and the problem presented as justification for this decision-making.

The delivery of election materials, in the limited number of CEAZs that KRIIK observers visited, proceeded in an orderly manner.

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The counting process started around 22:00 in Pustec Municipality, which according to the law brought the beginning of the counting of votes from abroad for the Korçë District.

The announcement by the CEC of the election results in Vora Municipality and Administrative Unit No. 10 in Tirana was officially carried out by the CEC on May 12, 2025, and not after the end of the voting process, with the argument, extralegal according to KRIIK, of the SEC that the electoral entity Democratic Party made such a request to the CEC. This decision was publicly opposed by the Socialist Party.

Regarding the process of counting the votes of the diaspora, following the claims of the Democratic Party for the different treatment of the envelopes that came from Greece due to problems with distribution and delivery in this country, the SEC in the early hours of May 12, 2025 made the decision "On the administration of the envelope "B", an integral part of the voting documentation from abroad, in the case when it is not evaluated by Groups of Counting Votes from Abroad (GCVA and CEVA". Regarding this decision, the Socialist Party has appealed to CSC, claiming that the decision is illegal and taken by the Commissioner exceeding his powers.

During the counting process, there was again an increased presence of representatives and observers from the electoral subjects both inside and outside the Vote Counting Centers, but there were no problems to be noted.

Recommendations

Regarding the other phases of the ongoing electoral process, KRIIK presents the following Recommendations:

- **Following the counting process on legal tracks** - The counting process in Albania has been characterized by slowness, unjustified blockages, conflicts, or other problems. KRIIK calls on all commissioners and vote counters to strictly implement the law and count every vote professionally and correctly, acting as impartial election officials and not as party representatives. Special care should be taken when counting votes for individual candidates, as experience from past elections has shown that their votes have been subject to deviations.
- **Strengthening the institutional culture for election disputes** - Electoral conflicts and disputes must be addressed exclusively through the institutional channels provided by law. Electoral subjects are encouraged to use legal complaint and appeal mechanisms, avoiding rhetoric that undermines confidence in the electoral process. The relevant institutions must handle these disputes with professionalism, transparency and within the legal deadlines, to strengthen trust in the institutional resolution of disputes.
- **Improving access to election materials for interested subjects** - The CEC, CEAZs and Vote Counting Groups should create more efficient procedures for notifying and facilitating the provision of candidates of electoral subjects with copies of counting records. This transparency is essential to ensure that all parties have equal access to information, preventing unnecessary suspicions and disputes based on lack of information.
- **More rigorous supervision of political observers and unauthorized persons** - A more effective control system should be established to prevent the presence of unauthorized persons in the election premises. Political parties must take full responsibility for the behavior of their representatives and supporters both in and around the Polling Stations. The heads of the CEAZs and the CEC must apply immediate sanctions to the detected violations.
- **Administrative investigation for specific accreditation issues** - The CEC should conduct a full and transparent administrative investigation regarding the issue of the accreditation of observers for ZAZ No. 27, which were cancelled, or other similar cases that may have occurred, including referral to law enforcement bodies. This process will serve as a precedent to ensure that the observer accreditation system strictly respects legal standards and prevent possible manipulations in the future.

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Acronyms

CEC - Central Election Commission
SEC - State Election Commissioner
CSC - Appeals and Sanctions Commission
RC - Regulatory Commission
JEC - Judicial Electoral College
GDCS - General Directorate of Civil Status
NRCS - National Register of Civil Status
IRI - Institutional Reporting Interface
EPR - Electronic platform for the registration of voters abroad
CEAZ - Zonal Electoral Administration Commission
PSC - Voting Center Commission
PS - Polling Station
VCC - Vote Counting Place
VCG - Vote Counting Group
GCVA – Groups of Counting for Votes from Abroad
CACEFV – Commission for the Administration, Counting and Evaluation of Foreign Votes
GP - General Prosecutor's Office
SPAK - Special Structure against Corruption and Organized Crime
SP - Socialist Party of Albania
DP-AGA - Coalition Democratic Party-Alliance for Great Albania
TOGETHER - Movement Together
HM - Homeland Movement
EAC - Euro-Atlantic Coalition Party
Initiative-AB - Coalition Initiative Albania Becomes
ANA - Albanian National Alliance Party
NDA - New Democracy Alliance Party
RCD - Right Coalition for Development
SDP - Social Democratic Party
OPPORTUNITY - Party Opportunity
RTSH – Albanian Radio Television
AMA – Audiovisual Media Authority
KRIIK - Coalition for Reforms, Integration and Consolidated Institutions