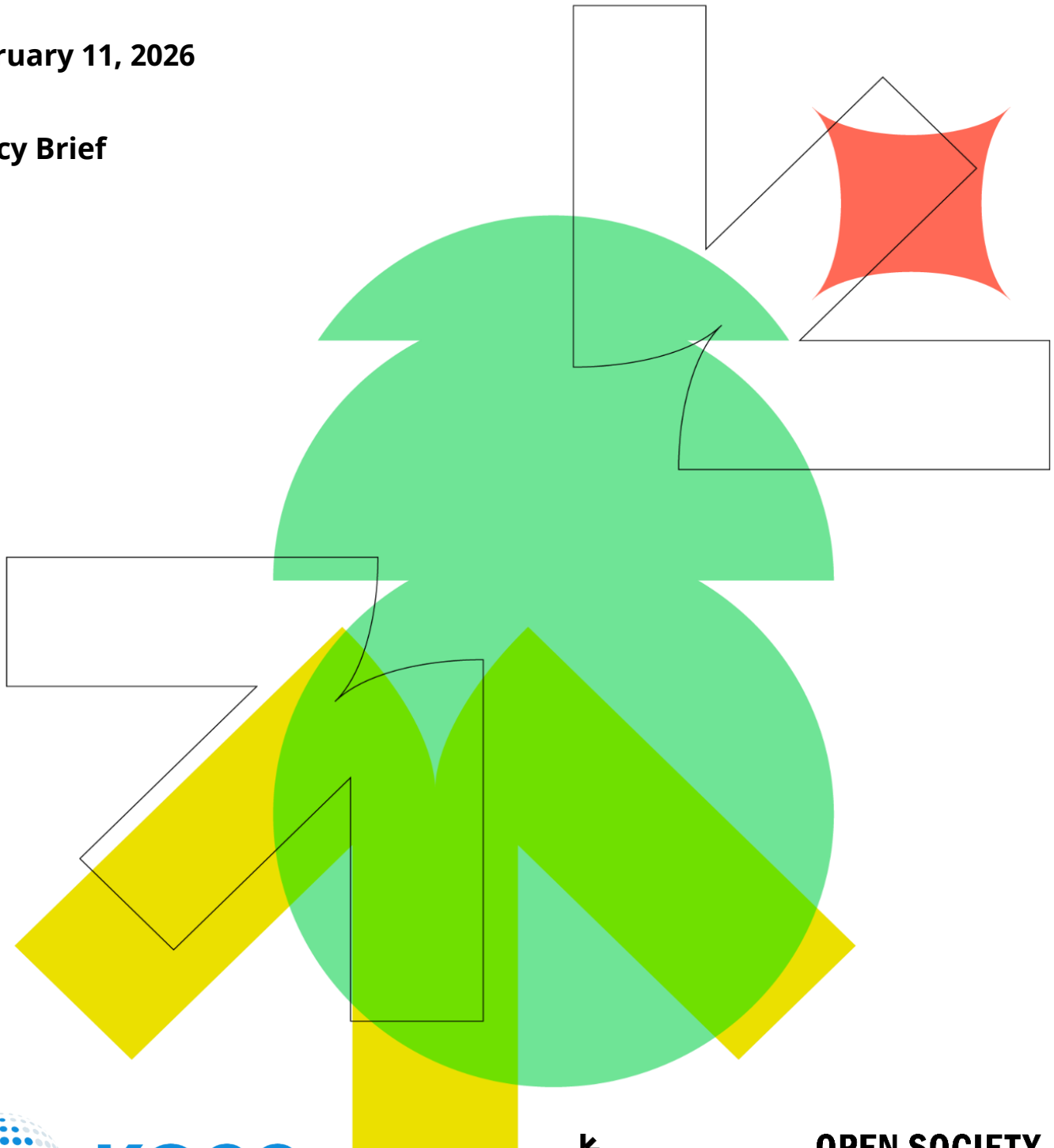


# Gradual Integration of the Six Western Balkans Countries (WB6) in the European Union: EU Agency for Cybersecurity, FDI Screening and EU Rule of Law Report

February 11, 2026

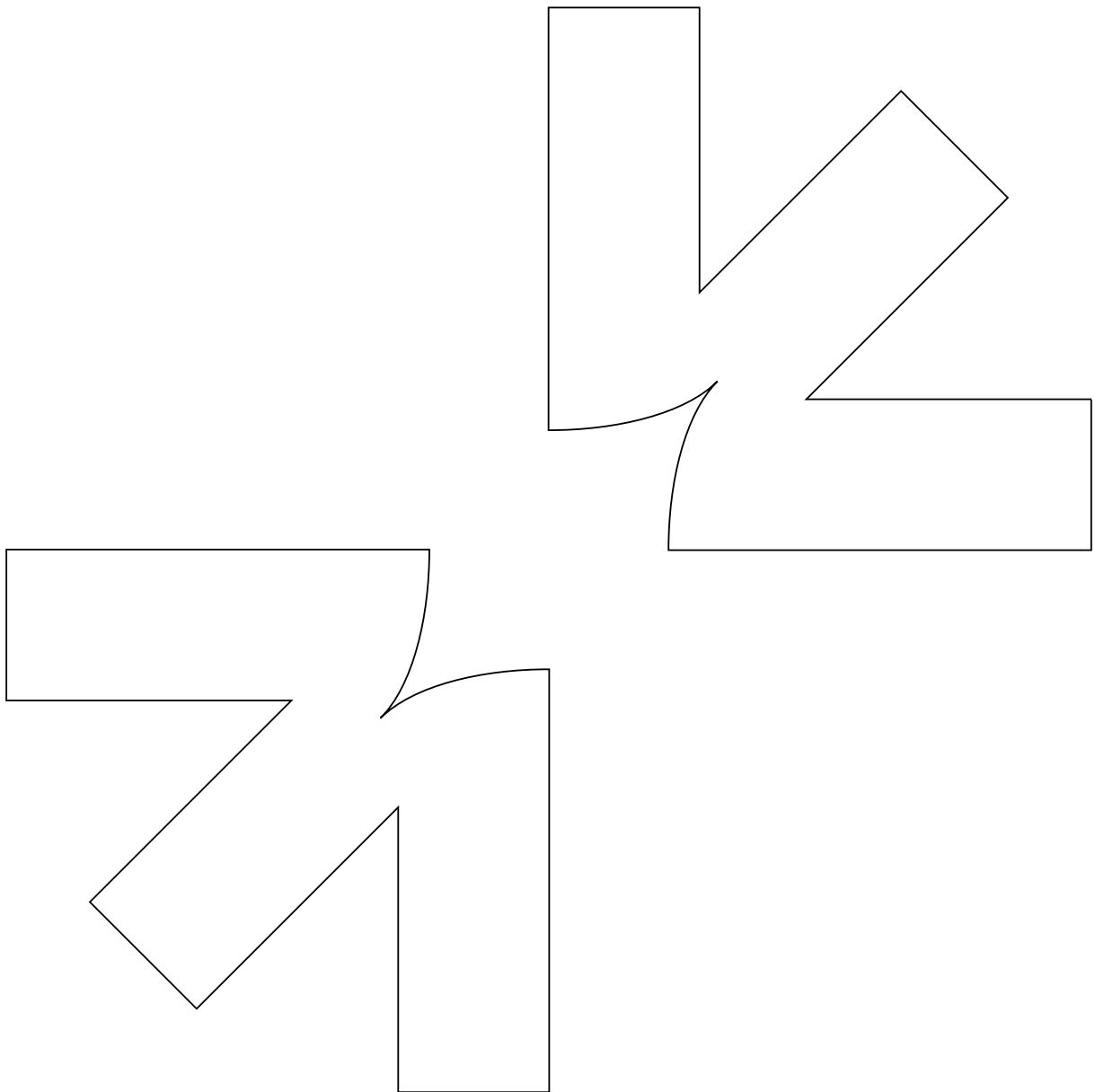
Policy Brief



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# Introduction

In March 2020, the Council of the European Union (EU) endorsed European Commission's (EC's) proposal for a new enlargement methodology for countries interested to become member states. Thus, for the six countries of the Western Balkans (WB6) that are in their EU accession paths and for other such countries, this marked the introduction of the new, enhanced EU accession methodology. Gradual integration, or phased accession, is one of the pillars of this new methodology. As an approach, this pillar allows the EU to support the WB6 countries in reaching EU standards by granting them access to its specialised mechanisms in specific policy areas, in parallel with reforms they implement.

In practice, this means enabling WB6 countries' institutions and other stakeholders dealing with specific policy areas to engage directly with their peers in the EU in an institutional learning process. EU agencies and other policy organisations and structures are typical such mechanisms. They are specialised EU-level institutions or bodies that drive – together with the EC (which also conducts membership negotiations with WB6 countries) – the development of the EU acquis in their policy areas through policy expertise. As such, they would play a critical role in guiding and supporting WB6 countries' institutions in their reforms to align with the EU acquis and European standards.

In this context, the Kosovar Centre for Security Studies is, for several years now, the leading civil society organisation working on phased accession of WB6 to the EU. We have been doing this through extensive policy research<sup>1</sup>, as well as by engaging in advocacy and promoting and facilitating policy dialogue across the region and with EU actors on these topics, in cooperation with COSs in other WB6 countries. Building on policy research and advocacy since 2024 on three topics – (1) Cooperation with the EU Agency for Cybersecurity, with a view to integration into it; (2) Alignment with the EU Regulation on Screening of FDI, including establishment of national FDI screening mechanisms; and (3) Inclusion into the EU Rule of Law Report – we have prepared the present follow-up policy brief on these topics. Therefore, this policy brief consists of three chapters – one on each topic – as well as main conclusions.

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<sup>1</sup> Kosovar Centre for Security Studies, *Integration of the Six Countries of the Western Balkans (WB6) in the European Union Agency for Cybersecurity*, [https://qkss.org/images/uploads/files/dESIGN\\_Integration\\_of\\_the\\_Six\\_Countries\\_of\\_the\\_Western\\_Balkans.pdf](https://qkss.org/images/uploads/files/dESIGN_Integration_of_the_Six_Countries_of_the_Western_Balkans.pdf); *Alignment of the Six Countries of the Western Balkans (WB6) with the EU Regulation on Screening of Foreign Direct Investments*, [https://qkss.org/images/uploads/files/FDI\\_Screening\\_Report\\_-\\_KCSS\\_3.pdf](https://qkss.org/images/uploads/files/FDI_Screening_Report_-_KCSS_3.pdf); *Inclusion of the Six Countries of the Western Balkans (WB6) in the European Union Rule of Law Report*, [https://qkss.org/images/uploads/files/Policy\\_brief\\_on\\_rule\\_of\\_law\\_revised.pdf](https://qkss.org/images/uploads/files/Policy_brief_on_rule_of_law_revised.pdf).

The purpose of this policy paper is to inform key stakeholders in WB6 countries and in the EU on the state of play of the ongoing reforms being pursued by WB6 countries in these areas. It also seeks to shape the public discourse in the region on the EU integration process. Third, we seek to support implementation of reforms in these areas, through policy advocacy and by promoting policy dialogue, including between governments and civil society organisations in the region. Therefore, this policy brief, which also serves as a policy monitoring tool, provides an update on the progress made by WB6 countries on these areas vis-à-vis recommendations of the first policy briefs we published in 2024 and 2025, respectively. It also discusses outstanding challenges facing these countries in their efforts to improve preparedness in these areas in the context of their EU accession reforms. It is mainly based on secondary sources allowing us to scan the factual situation. In order to collect more detailed information, we have also contacted national institutions of all WB6 in charge of cybersecurity (as well as the EU Cybersecurity Agency) and FDI screening, to conduct written interviews through a semi-structured questionnaire, but we received no response from any of them.

## Integration into the EU Cybersecurity Agency

This chapter discusses integration of WB6 countries in the EU Cybersecurity Agency (ENISA). It focuses on major developments in this regard since the publication of our first policy brief on this topic<sup>2</sup>, in September 2024. This chapter consists of two sections. The first section discusses the current situation and main developments in the area of cybersecurity in each WB6 country, particularly key reforms supporting their integration into ENISA. The second section discusses cooperation between each WB6 and this agency.

**Albania** is, according to the EC's 2025 Country Report, *between a moderate and good level of preparation* in the acquis Chapter 10 (Digital Transformation and Media)<sup>3</sup>, which cybersecurity is part of. *On legal reforms*, Albania's current Cybersecurity Law<sup>4</sup>, in force since May 2024, is aligned with the NIS2 Directive<sup>5</sup> and ensures protection of critical cybersecurity

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<sup>2</sup> Kosovar Centre for Security Studies, *Integration of the Six Countries of the Western Balkans (WB6) in the European Union Agency for Cybersecurity*.

<sup>3</sup> European Commission, *Albania 2025 Report*, p. 13, [https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f\\_en?filename=albania-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en?filename=albania-report-2025.pdf).

<sup>4</sup> Official Publications Centre of the Republic of Albania, *Ligji nr. 25.2025 për sigurinë kibernetike*, <https://qbz.gov.al/eli/ligj/2024/03/21/25>.

<sup>5</sup> EUR-Lex, Directive (EU) 2022/2555, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022L2555>.

infrastructure. Next, implementing legislation needs to be completed.<sup>6</sup> On *policy reforms*, Albania has adopted its Cybersecurity Strategy and Action Plan<sup>7</sup> and has updated the list of Critical and Important Information Infrastructure Operators.<sup>8</sup>

On the *institutional setup*, Albania has established its cybersecurity agency, the National Cyber Security Authority (NCSA), in 2017.<sup>9</sup> It has set in its Growth Plan Reform Agenda to ensure it functions in line with NIS2 Directive requirements by the end of 2026. It has also set out to make the CVD (coordinated vulnerability disclosure) and crisis management frameworks operational, as per NIS2, by the end of 2025.<sup>10</sup> Albania has established its national CSIRT (Computer Security Incident Response Team) / CERT (Computer Emergency Response Team) within the NCSA.<sup>11</sup> On *implementation*, Albania needs to further strengthen its cybersecurity capacities and infrastructure, as well as to make its new national security operations centre fully operational, work on awareness raising, strengthen capacities to investigate cybercrime, and continue implementing the EU 5G Cybersecurity Toolbox measures.<sup>12</sup>

**Bosnia and Herzegovina** is at an early stage of preparation in Chapter 10. On *legal reforms*, the 2025 EC country report underlines that BiH needs to develop its legislative framework in line with the EU acquis and European standards and to sign the Budapest Cybercrime Convention 2<sup>nd</sup> Additional Protocol.<sup>13</sup> BiH is being supported on the latter by the Council of Europe and the EC.<sup>14</sup> On *implementation*, the EC report underlines that BiH needs to strengthen capacities to fight cybercrime and continue implementing the EU 5G Cybersecurity Toolbox.<sup>15</sup> BiH has also not yet adopted a state-level cybersecurity strategy and to establish a cybersecurity agency and CERT / CSIRT at this level.

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<sup>6</sup> *Albania 2025 Report*, p. 13, 40, 46, 43, 71-72.

<sup>7</sup> National Cyber Security Authority of Albania, *The National Cyber Security Strategy 2025–2030 and Action Plan are approved*, <https://aksk.gov.al/en/the-national-cyber-security-strategy-2025-2030-and-action-plan-are-approved/>

<sup>8</sup> *Albania 2025 Report*, p. 13, 46.

<sup>9</sup> National Cyber Security Authority of Albania, *Report – Cybersecurity Governance in Albania 2023*, p. 4, <https://aksk.gov.al/wp-content/uploads/2024/06/GOVERNANCE-REPORT-NAECCS-2023.pdf>.

<sup>10</sup> Official Publications Centre of the Republic of Albania, *Ajenda Kombëtare e Reformave 2024-2027*, p.190, <https://qbz.gov.al/eli/vendim/2024/10/10/621>.

<sup>11</sup> National Cyber Security Authority of Albania, *Albania's National CSIRT*, <https://aksk.gov.al/en/critical-information-infrastructures/>, <https://aksk.gov.al/wp-content/uploads/2024/11/RFC-2350-description-for-AKSK-2024.pdf>.

<sup>12</sup> *Albania 2025 Report*, p. 37, 44.

<sup>13</sup> European Commission, *Bosnia and Herzegovina 2025 Report*, p. 13, [https://enlargement.ec.europa.eu/document/download/5d8fc547-f8f8-456f-84e3-b38998acfafd\\_en?filename=bosnia-and-herzegovina-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/5d8fc547-f8f8-456f-84e3-b38998acfafd_en?filename=bosnia-and-herzegovina-report-2025.pdf).

<sup>14</sup> Council of Europe, *CyberSEE*, <https://www.coe.int/en/web/cybercrime/-/cybersee-bosnia-and-herzegovina-moves-towards-the-signature-and-implementation-of-the-second-additional-protocol-to-the-convention-on-cybercrime>.

<sup>15</sup> *Bosnia and Herzegovina 2025 Report*, p. 13, 45, 47.

**Kosovo** has achieved *some level of preparation* in Chapter 10.<sup>16</sup> On *legal reforms*, its current Law on Cybersecurity<sup>17</sup>, in force since March 2023, is partially aligned with the acquis. In addition, eight out of 14 bylaws foreseen by this law have been adopted, and the Budapest Convention and its 2<sup>nd</sup> additional protocol are being implemented unilaterally. On the other hand, Kosovo needs to further align its legislation with the acquis, in particular with the NIS2 Directive.<sup>18</sup> To this end, it has set out in its Growth Plan Reform Agenda to amend its Cybersecurity Law and adopt it by the end 2026.<sup>19</sup> On the *policy framework*, the National Cybersecurity Strategy 2023-2027 has been drafted in compliance with ENISA guidelines and relevant practices of EU member states, and treats strengthening cooperation with ENISA as a priority, focusing on incident response, threat detection and capacity-building.<sup>20</sup> On the *institutional setup*, the EC recommends Kosovo to operationalise its Cybersecurity Agency.<sup>21</sup> In its Growth Plan Reform Agenda, Kosovo has set to make this agency operational, in line with NIS2 Directive requirements by the end of 2027. Kosovo has established its national CSIRT/CERT<sup>22</sup>, and will make it and its governmental CERT operational and obtain the accredited status on TF CSIRT Trusted Introducer by mid-2026.<sup>23</sup> On *implementation*, Kosovo has prepared the list of Operators of Essential Services and Digital Service Providers of essential and important entities.<sup>24</sup> In its Growth Plan Reform Agenda, it has set to introduce and put in use frameworks as required by the NIS2 Directive (by mid-2027): a strategy on the security of network and information systems, a single contact point, as well as the crisis management cooperation and CVD frameworks.<sup>25</sup>

**Montenegro** has achieved a *good level of preparation* in Chapter 10.<sup>26</sup> On *legal reforms*, its current Law on Information Security<sup>27</sup>, in force since December 2024 (as in the Growth Plan

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<sup>16</sup> European Commission, *Kosovo 2025 Report*, p. 13, [https://enlargement.ec.europa.eu/document/download/127563ea-4c03-44a4-b56c-2d569afd86a5\\_en?filename=kosovo-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/127563ea-4c03-44a4-b56c-2d569afd86a5_en?filename=kosovo-report-2025.pdf).

<sup>17</sup> Official Gazette of the Republic of Kosovo, *Law No. 08/L-173 on Cybersecurity*, <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=70933>.

<sup>18</sup> *Kosovo 2025 Report*, p. 13, 24, 42, 74.

<sup>19</sup> Office of the Prime Minister of the Republic of Kosovo, *Reform Agenda of Kosovo*, p. 47-48, 124, <https://kryeministri.rks-gov.net/wp-content/uploads/2024/10/RGF-Kosovo-Reform-Agenda.pdf>.

<sup>20</sup> Ministry of Internal Affairs of the Republic of Kosovo, *National Cybersecurity Strategy 2023-2027*, p. 12-13, 29, <https://mpb.rks-gov.net/Uploads/Documents/Pdf/EN/2692/Strategjia%20p%C3%ABr%20Siguri%20Kibernetike%20-%20ENG..pdf>.

<sup>21</sup> European Commission, *Kosovo 2025 Report*, p. 74.

<sup>22</sup> Kosovo National Cybersecurity Unit, *About Us*, <https://www.kos-cert.org/en/index.php/aboutus>.

<sup>23</sup> *Reform Agenda of Kosovo*, p. 47-48, 124.

<sup>24</sup> *Kosovo 2025 Report*, p. 74.

<sup>25</sup> *Reform Agenda of Kosovo*, p. 47-48, 124.

<sup>26</sup> European Commission, *Montenegro 2025 Report*, p. 14, [https://enlargement.ec.europa.eu/document/download/9ae69ea7-81d6-4d6a-a204-bd32a379d51d\\_en?filename=montenegro-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/9ae69ea7-81d6-4d6a-a204-bd32a379d51d_en?filename=montenegro-report-2025.pdf).

<sup>27</sup> Government of Montenegro, *Zakon o informacionoj bezbjednosti*, <https://wapi.gov.me/download-preview/23936380-482a-4784-bd94-be69413d7334?version=1.0>.

Reform Agenda)<sup>28</sup>, is further aligned with the NIS2 Directive. On the other hand, EC report states that its legislation needs to be fully aligned with the NIS2 Directive and implemented.<sup>29</sup> On the *institutional setup*, the EC recommends Montenegro to set up its Cybersecurity Agency<sup>30</sup>, due by March 2025 (Law on Information Security) or the end of 2025 (Growth Plan Reform Agenda).<sup>31</sup> Thus, in 2025 the Ministry of Public Administration (MPA) tabled to the Government proposals to appoint its director and board members and the budget was also allocated.<sup>32</sup> Montenegro's national CSIRT/CERT is established and functions within the MPA.<sup>33</sup>

On *implementation*, Montenegro needs to start implementing the EU 5G Cybersecurity Toolbox and to meet NIS2 requirements for critical infrastructure, including by assessing suppliers' risk profile and putting in place appropriate restrictions and/or exclusions for them.<sup>34</sup> Montenegro has set out in its Growth Plan Reform Agenda to set up and put in use frameworks required by NIS2 (CVD and crisis management frameworks) by the end of 2025.<sup>35</sup>

**North Macedonia** is *moderately prepared* in Chapter 10.<sup>36</sup> On *legal reforms*, its current Law on Security of Networks and Information Systems, in force since 1 January 2026, is aligned with the NIS2 Directive. Its main objective is to establish a common high level of protection of information networks and systems in both public and private sectors.<sup>37</sup> It needs to ratify the Budapest Convention 2<sup>nd</sup> Additional Protocol.<sup>38</sup> On *policy reforms*, North Macedonia has adopted its 2025-2028 Cybersecurity Strategy and the Action Plan (2025-2027).<sup>39</sup>

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<sup>28</sup> EU Integration Portal of Montenegro, *Reformska agenda Crne Gore 2024-2027*, p. 126, <https://www.eu.me/download/1696/crna-gora-i-eu/31923/reformska-agenda-crne-gore-2024-2027.pdf>.

<sup>29</sup> *Montenegro 2025 Report*, p. 14, 81-82.

<sup>30</sup> *Ibid*, p. 14.

<sup>31</sup> *Reformska agenda Crne Gore 2024-2027*, p. 126.

<sup>32</sup> Radulović, Đurđa, *Crna Gora i sajber bezbjednost: i dalje nezaštićeni*, <https://www.cin-cg.me/crna-gora-i-sajber-bezbjednost-i-dalje-nezasticeni/#>.

<sup>33</sup> Government of Montenegro, *CIRT*, <https://www.gov.me/en/cirt>.

<sup>34</sup> *Montenegro 2025 Report*, p. 14, 81-82.

<sup>35</sup> *Reformska agenda Crne Gore 2024-2027*, p. 126.

<sup>36</sup> European Commission, *North Macedonia 2025 Report*, p. 13, [https://enlargement.ec.europa.eu/document/download/267b368e-6b55-4a42-bb72-6395593de4da\\_en?filename=north-macedonia-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/267b368e-6b55-4a42-bb72-6395593de4da_en?filename=north-macedonia-report-2025.pdf).

<sup>37</sup> *New Legal Framework for Cyber Security*, <https://pp-lf.com/new-legal-framework-for-cyber-security/>.

<sup>38</sup> *North Macedonia 2025 Report*, p. 13, 45, 73.

<sup>39</sup> Ministry of Digital Transformation of the Republic of North Macedonia, *Cybersecurity Strategy*, <https://mdt.gov.mk/en-GB/regulativa/strategija-za-sajber-bezbednost>.

On the *institutional setup*, North Macedonia has not yet established its cybersecurity agency, but it has established a Cybersecurity Unit (within the Ministry of Interior)<sup>40</sup> and its national CSIRT/CERT (in 2016).<sup>41</sup> It needs to further strengthen the infrastructure and increase expertise in the area of cybersecurity, due to weakness to ITC infrastructure cyberattacks. On *implementation*, it needs to continue implementing the EU 5G Cybersecurity Toolbox measures, including by assessing the risk profile of suppliers and putting in place appropriate restrictions and/or exclusions for high-risk suppliers.<sup>42</sup>

**Serbia** is *moderately prepared* in Chapter 10.<sup>43</sup> On *legal reforms*, its new Information Security Law entered into force in October 2025.<sup>44</sup> The EC report notes that Serbia has made some progress in the alignment of its legislation with the 5G Security Toolbox, but needs to further align its legislation with the NIS2 Directive. On *policy reforms*, its Strategy to Combat Cybercrime expired at the end of 2023, so it needs to adopt a new one.<sup>45</sup> On the *institutional setup*, Serbia has a Cybersecurity Unit<sup>46</sup>, but not a cybersecurity agency, but has established its national CSIRT/CERT.<sup>47</sup> On *implementation*, the EC report states that Serbia needs to fully implement the recently transposed EU 5G Cybersecurity Toolbox, including by assessing suppliers risk profiles and putting in place appropriate measures against high-risk suppliers.<sup>48</sup>

## Cooperation with ENISA

ENISA's International Cooperation Strategy prioritizes cooperation with WB6. According to it, the focus should be to provide them expertise on policy implementation and awareness and education in this area, as well as to support them in building competences and capabilities through training and exercises.<sup>49</sup> All WB6 have, in various policy dialogue events, have expressed their interest in engaging in formal cooperation with it. They also did so at the recent 7<sup>th</sup> Western Balkans Digital Summit held in October 2025, in Skopje, co-organised

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<sup>40</sup> Ministry of Interior of the Republic of North Macedonia, *Cybersecurity Unit*, <https://mvr.gov.mk/en-GB/ministerstvo/cybersecurity>.

<sup>41</sup> MKD-CIRT, *About Us*, <https://mkd-cirt.mk/za-nas/>.

<sup>42</sup> *North Macedonia 2025 Report*, p. 13, 73, 96.

<sup>43</sup> European Commission, *Serbia 2025 Report*, p. 13, [https://enlargement.ec.europa.eu/document/download/6e68ce26-b95b-48e1-921a-c60c12da8foo\\_en?filename=serbia-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/6e68ce26-b95b-48e1-921a-c60c12da8foo_en?filename=serbia-report-2025.pdf).

<sup>44</sup> *Zakon o informacionoj bezbednosti*, <https://www.paragraf.rs/propisi/zakon-o-informacionoj-bezbednosti-2025.html>.

<sup>45</sup> *Serbia 2025 Report*, p. 13.

<sup>46</sup> Council of Europe – Octopus Cybersecurity Community, *Serbia*, <https://www.coe.int/en/web/octopus/-/serbia>.

<sup>47</sup> Serbia's CERT, <https://www.cert.rs/en/cesto-postavljana-pitanja.html>.

<sup>48</sup> *Serbia 2025 Report*, p. 13, 49, 81.

<sup>49</sup> ENISA, *International Cooperation Strategy of the EU Agency for Cybersecurity*, p. 6-7, [https://www.enisa.europa.eu/sites/default/files/all\\_files/2022-02-16%20ENISA%20International%20Strategy.pdf](https://www.enisa.europa.eu/sites/default/files/all_files/2022-02-16%20ENISA%20International%20Strategy.pdf).

by the Regional Cooperation Council. Joint conclusions point out WB6's commitment to strengthen cybersecurity through closer cooperation with ENISA.<sup>50</sup>

**Albania** has engaged in facilitating policy dialogue with ENISA at the regional level, through a regional roundtable co-hosted by NCSA and attended by public institutions and NGOs from the region. It focused on advancing gradual integration on WB6 into ENISA, including recommendations of our September 2024 policy brief.<sup>51</sup> NCSA also facilitated Albania's participation in the European Cybersecurity Challenge competition organised by ENISA<sup>52</sup>, to support capacity-building and promote excellence and networking among future professionals.

**Bosnia and Herzegovina** has benefited from EU support for the WB region in the area of cybersecurity, particularly for capacity-building. It also participated in regional policy events such as the 7<sup>th</sup> Western Balkans Digital Summit.

**Kosovo** participated in two editions of the European Cyber Security Challenge, in 2024 and 2025. This supports capacity-building of professionals by offering them access to other European countries and networking with them.<sup>53</sup> It also participated in regional policy dialogue such as the 7<sup>th</sup> Western Balkans Digital Summit.

**Montenegro** established direct communication with ENISA in 2023, and the Government expects support from it in legal alignment, in establishing the cybersecurity agency and building cybersecurity capacities and infrastructure.<sup>54</sup>

**North Macedonia** benefits from regional activities supporting alignment of the legislation, policies, institutions and the practice in the area of cybersecurity with the EU acquis and standards. It also participates in regional policy dialogue such as the 7<sup>th</sup> Western Balkans Digital Summit.

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<sup>50</sup> Regional Cooperation Council, *Western Balkans Digital Summit 2025*, <https://www.rcc.int/news/969/western-balkans-digital-summit-2025-concludes-in-skopje-with-strong-regional-commitments-on-connectivity-and-digital-identity>.

<sup>51</sup> National Cybersecurity Authority of Albania, *Discussion roundtable on Inclusion of the Western Balkan in EU Cybersecurity Policies and Mechanisms*, <https://aksk.gov.al/en/the-discussion-table-is-organized-on-the-inclusion-of-the-western-balkans-in-the-policies-and-mechanisms-of-the-european-union-for-cyber-security/>.

<sup>52</sup> National Cybersecurity Authority of Albania, <https://aksk.gov.al/en/teamalbania-2/>.

<sup>53</sup> *The Kosova Cyber Team joins the European Cybersecurity Challenge 2025*, <https://luxdev.lu/en/news/kosova-cyber-team-joins-european-cybersecurity-challenge-2025>.

<sup>54</sup> Government of Montenegro, *Uspostavljena direktna komunikacija i konkretna saradnja Crne Gore i Agencije za sajber bezbjednost Evropske Unije (ENISA)*, <https://www.gov.me/clanak/uspostavljena-direktna-komunikacija-i-konkretna-saradnja-crne-gore-i-agencije-za-sajber-bezbjednost-evropske-unije-enisa>.

**Serbia** has engaged in exchange with ENISA in November 2023 through a study visit at its HQ in Athens. Discussions focused on alignment with the NIS2 Directive, policy frameworks, ICT certification schemes and cybersecurity public awareness.<sup>55</sup>

## Alignment with the EU FDI Screening Regulation

This chapter discusses alignment of WB6 countries' legislation with the EU FDI Screening Regulation<sup>56</sup> (EUFDISR) and implementation of the aligned legislation, in particular the setting up of national FDI screening mechanisms in each country in line with the EUFDISR. It focuses on relevant developments in this regard in each WB6 country since the publication of our first policy brief on this topic<sup>57</sup>, in May 2025. We particularly look at the reforms supporting the WB6 countries' gradual alignment with the EUFDISR requirements, based on the policy recommendations of our policy brief published last year.

**Albania** was last year, as noted in our first policy paper on this topic, considering in its national parliament a new draft-law regulating FDI screening, aimed at aligning with the EUFDISR, tabled by one of its MPs. However, the work towards establishing an FDI screening mechanism is still ongoing. By July 2025, the parliament only adopted amendments to the Law on Foreign Investments, allowing the Government to work on provisions to enforce FDI screening.<sup>58</sup> This is the Law No. 56/2025 amending the first Law on Foreign Investments [Law No. 7594 of 1993] and amended in 2010 [Law No. 10316 of 2010]].<sup>59</sup> The latest EC Country Report (November 2025) underlines that Albania needs to align its national legislation on the screening of foreign investments with the EUFDISR.<sup>60</sup>

This amendment complemented Article 10 of this law, regulating national security in the context of foreign investments. Article 10 stipulates as follows: *"No provision of this law shall*

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<sup>55</sup> Ministry of Information and Telecommunications of the Republic of Serbia, *Delegacija Republike Srbije u studijskoj poseti Atini*, <https://www.mit.gov.rs/vest/sr/3039/delegacija-republike-srbije-u-studijskoj-poseti-atini.php>.

<sup>56</sup> EUR-Lex, *Regulation (EU) 2019/452 of the European Parliament and of the Council of 19 March 2019 establishing a framework for the screening of foreign direct investments into the Union*, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0452>.

<sup>57</sup> Kosovar Centre for Security Studies, *Alignment of the Six Countries of the Western Balkans (WB6) with the EU Regulation on Screening of Foreign Direct Investments*.

<sup>58</sup> *Albania 2025 Report*, p. 19-20, 91.

<sup>59</sup> Albanian Investment Development Agency, *Ligji për investimet e huaja*, <https://aida.gov.al/wp-content/uploads/2023/12/LIGJI-PER-INVESTIMET-E-HUAJA-1.pdf>.

<sup>60</sup> *Albania 2025 Report*, p. 19-20, 91.

prevent the Republic of Albania to enforce measures that are necessary for the maintenance of public order, the fulfilment of its international obligations relating to the maintenance or establishment of international peace and security, the protection of national security or defence interests.”<sup>61</sup> Thus, this law establishes three legal grounds based upon which the state has the right to impose restrictions on FDI: (1) maintenance of public order, (2) state’s obligations towards international peace and security, and (3) protection of national security or defence interests. Within the scope of this article, the amendment adopted in 2025 stipulates as follows: “Foreign direct investments, related to or affecting critical public infrastructure, critical technology and dual-use goods, the supply of critical inputs, access to sensitive information or media freedom, as defined in the Regulation (EU) 2019/452 of the European Parliament and of the Council of the European Union, shall be subject to an assessment or review according to the rules and procedures adopted by decision of the Council of Ministers.”<sup>62</sup>

Thus, the Law No. 56/2025 establishes the legal basis for a future national FDI screening mechanism in Albania. In order to establish the regulatory framework governing such a mechanism, the Ministry of Economy and Innovation prepared a draft regulation on procedures for the assessment and review of FDI within the scope of this law. and published it for public consultation in early December 2025.<sup>63</sup> According to the draft, the purpose of this regulation will be to set rules and procedures on assessment and review of FDI (FDI screening) in Albania relating or affecting critical public infrastructure, critical technology and dual use goods, provision of critical inputs, access to sensitive information or media freedom, and on coordination with EU member states.

This law also establishes legal grounds for the Government to carry out screening of foreign investments, namely further grounds, or risk factors. It stipulates that a foreign investment shall be screened if it is related to or affects: (1) critical public infrastructure, (2) critical technologies and dual use goods, (3) supply of critical inputs, (3) access to sensitive information, and (5) media freedom. In this light, Albania’s Law on Foreign Investments is partially aligned with Article 4 of the EUFDISR, as it defines security and public order as ground of FDI screening, as well as five key risk factors for such a procedure. Furthermore, by reference to definitions established by the EUFDISR (“as defined in the Regulation (EU)

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<sup>61</sup> Ligji për investimet e huaja, Art. 10.

<sup>62</sup> Official Publications Centre of the Republic of Albania, Ligji nr. 56/2025 (Fletorja Zyrtare e Republikës së Shqipërisë – viti 2025, nr. 124), p. 3/18779, <https://qbz.gov.al/share/Cizovu5lRc2g4iOcNUYYTw>.

<sup>63</sup> Electronic Register of Information and Public Consultations of the Republic of Albania, Projektvendim “Për miratimin e rregullores mbi procedurat për vlerësimin dhe shqyrtimin e investimeve të huaja direkte që lidhen me ose ndikojnë infrastrukturën publike kritike, teknologjinë kritike dhe mallrat me përdorim të dyfishtë, furnizimin me të dhëna kritike, qasjen në informacion të ndjeshëm apo për lirinë e medias”, <https://konsultimipublik.gov.al/Konsultime/Detaje/901>.

2019/452), it applies to these five main risk factors within the same scope as the EUFDISR. Thirdly, it stipulates that detailed rules and procedures for screening of investments shall be introduced by the Government, presumably through implementing legislation.

Thus, this law implies that foreign investments from any country carrying these five risk factors shall be subject to screening under the Albanian FDI screening regime, thus treating investments from the EU single market the same way as investments from countries that are under the EUFDISR categorised as third countries. On the other hand, Article 1 of the EUFDISR specifies that only investments from third countries into the EU single market are subject to screening under the FDI screening regime in the EU. However, it does not transpose other risk factors, namely those outlined in paragraph 2 of Article 4 of the EUFDISR. It also does not transpose principles enshrined in Article 3 of the EUFDISR, in particular transparency of rules and procedures, treatment of confidential information and the right of investors that are subject to screening to seek recourse against screening decisions.

Overall, Albania's Law on Foreign Investments is partially aligned with the EUFDISR. Moreover, the whole picture and the direction of reforms related to FDI screening is not yet clear. Albania also seeks to adopt a unified law on investments, a reform that it has been working on for years but has further postponed.<sup>64</sup> This reform is also part of Albania's Growth Plan Reform Agenda, wherein it has committed to adopt unified investment law/s and implementing legislation by the end of this year, in line with EU best practice.<sup>65</sup>

**Bosnia and Herzegovina** has not made much progress in aligning with the EUFDISR since our last year's paper on this topic. It has yet to align its legislation with the EU acquis on FDI screening.<sup>66</sup> Thus, BiH has not yet established an FDI screening regime in line with this regulation.

**Kosovo** has made no progress since the publication of our last policy brief on this topic in completing its implementing legislation deriving from the Law on Sustainable Investments<sup>67</sup> (in force as of September 2024) that has established the legal basis for a national FDI screening mechanism and the mechanism itself, in line with the EUFDISR. The EC, in its latest Country Report, has concluded that Kosovo has yet to align its legislation with the EU acquis

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<sup>64</sup> *Albania 2025 Report*, p. 55.

<sup>65</sup> *Agjenda Kombëtare e Reformave 2024-2027*, p. 186.

<sup>66</sup> *Bosnia and Herzegovina 2025 Report*, p. 90.

<sup>67</sup> Official Gazette of the Republic of Kosovo, *Law on Sustainable Investments*, <https://gzk.rks.gov.net/ActDocumentDetail.aspx?ActID=96277>.

on FDI screening, and has thus recommending it to do so.<sup>68</sup> However, since this conclusion is general, with no reference made to this law's current level of alignment with the EUFDISR, it is unclear what exactly the EC expects from Kosovo in terms of the direction of this reform from now on. On the other hand, in line with this law, it has agreed with Kosovo, in its Growth Plan Reform Agenda, to go ahead with full operationalisation of the Agency of Investment and Export.<sup>69</sup>

**Montenegro** has made no progress since the publication of our last policy brief on this topic in adopting a law governing FDI screening in line with the EUFDISR. Thus, it has not yet created the legal basis for a national FDI screening mechanism in line with this regulation, and therefore it has yet to establish such a mechanism. The EC, in its latest Country Report, has concluded that Montenegro has yet to align its legislation with the EU *acquis* on screening of foreign direct investments, and thus recommended it do to so.<sup>70</sup>

**North Macedonia** has made no significant progress since the publication of our last policy brief on this topic in adopting a law governing FDI screening in line with the EUFDISR. It has, thus, not yet created the legal basis for a national FDI screening in line with this regulation, and therefore it has yet to establish such a mechanism. The EC, in the latest Country Report, has recommended North Macedonia to align its legislation with the EUFDISR. It has also reported that this country has established a working group to prepare a law establishing such a mechanism.<sup>71</sup>

**Serbia** has made no progress since the publication of our last policy brief on this topic in adopting a law governing FDI screening in line with the EUFDISR. Thus, it has yet to establish the legal basis and a national mechanism for screening of FDI in line with this regulation. The latest EC Country Report has concluded that Serbia has yet to align its legislation with the EU *acquis* on screening of foreign direct investments.<sup>72</sup>

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<sup>68</sup> Kosovo 2025 Report, p. 18, 90.

<sup>69</sup> Reform Agenda of Kosovo, p. 127.

<sup>70</sup> Montenegro 2025 Report, p. 20, 99.

<sup>71</sup> North Macedonia 2025 Report, p. 19, 94. See also <https://mep.gov.mk/en-GB/transparentnost/novosti/mep-murtezani-na-konstitutivnata-sednica-na-rabotnata-grupa-za-vospostavuvanje-na-model-za-nacionalen-mexanizam-za-proverka-na-stranskite-direktni-investicij>.

<sup>72</sup> European Commission, Serbia 2025 Report, p. 102, [https://enlargement.ec.europa.eu/document/download/6e68ce26-b95b-48e1-921a-c60c12da8foo\\_en?filename=serbia-report-2025.pdf](https://enlargement.ec.europa.eu/document/download/6e68ce26-b95b-48e1-921a-c60c12da8foo_en?filename=serbia-report-2025.pdf).

# Inclusion into the EU Rule of Law Report

This chapter discusses inclusion of WB6 countries into the EU Rule of Law Report (EURoLR). There is no improvement regarding the inclusion of WB6 countries in this mechanism since 2024 and since we published the policy brief on this topic<sup>73</sup>: again only Albania, Montenegro, North Macedonia and Serbia were included in the latest report (published in July 2025)<sup>74</sup>, while Bosnia and Herzegovina and Kosovo remain completely excluded from this mechanism. Given this, we provide an overview of main findings of the Report<sup>75</sup>, focusing on the progress achieved and ongoing challenges identified in the four policy areas covered: justice system, anticorruption framework, media pluralism and freedom, and institutional issues linked to checks and balances. Findings of 2024 and 2025 EURoLR on these WB6 countries are also listed in the annex, thus allowing one to compare trends in each of them.

## **Albania**

In the area of the *justice system*, Albania continued progressing since 2024 in accountability, as a result of the vetting process, and digitalisation of case management in courts and prosecution offices. On the other hand, appointments and shortage of resources remain two main ongoing challenges. In the area of *anticorruption framework*, Albania adopted a multiannual anticorruption strategy, made further progress on declarations of assets with their verification, and track record in fighting corruption (notably at high level) also improved further in 2025. In addition, Albania undertook some steps towards reforming its legislation on conflict of interest.

The situation is less positive in the area of the *media pluralism and media freedom*. In terms of progress made, the law governing public service media is in place. On the other hand, main challenges facing Albania include independence of the public broadcaster and the media regulator, high concentration of media ownership, and shortcomings in fair allocation of state advertising and other state resources. Finally, the situation is better on

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<sup>73</sup> Kosovar Centre for Security Studies, *Inclusion of the Six Countries of the Western Balkans (WB6) in the European Union Rule of Law Report*.

<sup>74</sup> European Commission, *2025 Rule of Law Report – Communication and Country Chapters*, [https://commission.europa.eu/publications/2025-rule-law-report-communication-and-country-chapters\\_en](https://commission.europa.eu/publications/2025-rule-law-report-communication-and-country-chapters_en).

<sup>75</sup> European Commission, *Communication: 2025 Rule of Law Report – The Rule of Law Situation in the European Union*, [https://commission.europa.eu/document/download/of7b852b-6b8a-4e21-8579-69db5386c6a2\\_en?filename=1\\_1\\_63910\\_communication\\_rol\\_en.pdf](https://commission.europa.eu/document/download/of7b852b-6b8a-4e21-8579-69db5386c6a2_en?filename=1_1_63910_communication_rol_en.pdf).

*institutional issues linked to checks and balances.* The Constitutional Court continues to function effectively and CSOs remain free to operate. On the other hand, the quality of the legislative process, as well as registration requirements and limited public funding for CSOs are two main outstanding challenges.

### **Montenegro**

In the area of the *justice system*, Montenegro continued progressing by implementing its recently amended legal framework and improving promotion and enforcement of ethics and professional standards among judges and prosecutors. On the other hand, it still needs to improve the composition of its Judicial and Prosecutorial Councils. Montenegro also kept progressing in the area of *anticorruption framework*, by implementing its strategy against corruption and the new legal framework on protection of whistleblowers and slightly increasing human resources to fight corruption, while efforts to improve the track record against high-level corruption and in high risk areas are ongoing. On the other hand, main ongoing challenges it faces include a low number of final convictions, lack of effective and deterrent penalties, and insufficient human resources to fight corruption. Montenegro also faces shortcomings in the scope, clarity and in implementation of its legal framework regulating political party financing.

In the area of *media pluralism and media freedom*, the EURoLR has found that Montenegro has improved rules on transparency of media ownership information, and ensured prompt and effective response to violence against journalists. On the other hand, key remaining challenges include transparency of media ownership, as rules have only improved in relation to media providers, as well as amending the legal framework on access to information and implementing it effectively. Finally, on *institutional issues linked to checks and balances*, the 2025 report has found that civil society functions in an enabling environment and that a new law on the Ombudsperson, being drafted, will be fully aligned with international standards and will further strengthen this institution. On the other hand, main challenges include effectiveness of public consultations, challenges facing CSOs and concerns over the respect by the parliament of the independence of the Constitutional Court.

### **North Macedonia**

In the area of the *justice system*, North Macedonia is pursuing legislative reforms to strengthen its independence, as well as undertaking efforts to strengthen transparency and to further improve digital tools. On the other hand, the 2025 report raises serious concerns over the respect of the independence of this system due to interference and pressure from

other branches, as well as concerns regarding appointment decisions. Other outstanding challenges facing the justice system in this country include an outdated digital infrastructure and limited financial resources. In the area of *anticorruption framework*, the prosecution of North Macedonia has strengthened capacities for investigation and has improved cooperation with other institutions. On the other hand, in terms of challenges, this report has found that implementation of the anticorruption strategy is insufficient and that amendments to the criminal code adopted in 2023 hinder efforts to combat corruption, in particular high level corruption. Other challenges in this area include delays in court proceedings and resource constraints.

In the area of *media pluralism and media freedom*, the 2025 EURoLR has found that North Macedonia has improved financial independence of media regulators. On the other hand, it has found that media experts and CSOs have raised concerns over the reintroduction of state-funded advertising. Lastly, in the area of *institutional issues linked to checks and balances*, the Government has initiated measures to enhance cooperation with civil society, and the role of Constitutional Court in monitoring and enforcement of its decisions has been strengthened. On the other hand, there are still shortcomings in implementing processes for inclusive and evidence-based policymaking and civil society has raised concerns, including online hate speech.

### **Serbia**

On *justice system*, the 2025 EURoLR has found an overall positive picture on civil, commercial and criminal cases, and that a new prosecutorial case management system is being implemented. On the other hand, it raises concerns over high political pressure on the justice system and the independence of the prosecution. Moreover, shortcomings in law and practice hamper effectiveness and confidentiality of criminal investigations, and there are also serious challenges in handling administrative cases and constitutional complaints. In the area of *anticorruption framework*, Serbia has adopted a multiannual anticorruption strategy. On the other hand, main challenges include establishing a robust track record of investigations, indictments and final convictions in cases of high-level corruption, insufficient human resources to process and investigate complex cases of organised crime and high-level corruption, and persistent weaknesses in the verification of asset declarations and conflict of interest. On corruption-risk sectors, key challenges include persistent wide use of exemptions and insufficient oversight mechanisms in public procurement.

In the area of *media pluralism and media freedom*, the 2025 report has not reported any progress. It raises concerns over journalists' safety and public broadcaster's independence, and has found that measures to increase transparency in ownership structures and public funding are only partially implemented. The 2025 report has also not reported any progress on *institutional issues linked to checks and balances*. On the other hand, persistent challenges facing Serbia include increasing pressure and attacks against CSOs, as well as the use of spyware to target journalists, environmental activists and other individuals. On other persistent challenges, the parliament is unable to exercise the oversight function and the Constitutional Court is inefficient.

## Conclusions

As findings of this policy brief show, WB6 countries have overall made some progress towards aligning with the EU acquis and standards on cybersecurity and FDI screening. On the other hand, no progress has been made in 2025 towards the inclusion of the two WB6 countries who were not included in the 2024 into the EU Rule of Law Report (Bosnia and Herzegovina, and Kosovo), whereas the four ones that are included for the second consecutive year (Albania, Montenegro, North Macedonia, and Serbia) show rather mixed results.

On **cybersecurity**, Albania, Kosovo, Montenegro, North Macedonia and Serbia have since the publication of our policy brief on this topic, in September 2024, adopted their national cybersecurity laws. On the other hand, BiH has not yet adopted such a law at the state level. On the *policy framework*, all but BiH and Serbia have adopted their national cybersecurity strategies. On *institutional framework*, only Albania has a fully functional cybersecurity agency, while the rest are at various stages of preparations towards establishing and making them fully operational. Similarly, all but BiH have established their national CSIRTs/CERTs and are working on further strengthening them, in line with EU acquis requirements and European standards, including by committing themselves to do so in their respective Reform Agendas under the EU Growth Plan for the Western Balkans. On *implementation*, a priority for all WB6 countries is full implementation of the EU 5G Cybersecurity Toolbox.

On *cooperation with ENISA*, so far none of the WB6 countries have established any formal cooperation with this agency. They have all established some initial contact with it, either through bilateral visits or through some form of regional policy dialogue. There are also

those, such as Albania and Kosovo, that participated in the European Cyber Security Challenge, a European competition for young people that supports capacity-building by promoting excellence and networking among future professionals.

*To conclude, most recommendations of our 2024 policy brief on integration of WB6 countries into the EU Agency for Cybersecurity have not been implemented by them, so they remain relevant.*

Less progress can be reported on **screening of foreign direct investments** since the publication of our policy brief on this topic, in May 2025. On the *legal framework*, Kosovo and Albania have adopted their laws on FDI screening, in line with the EUFDISR, thus providing the legal basis to establish a national FDI screening mechanism, and are working on preparing the implementing legislation. All the remaining four countries have yet to adopt both framework and implementing legislation for this purpose.

*To conclude, most recommendations of our 2025 policy brief on alignment with the EU Regulation on Screening of Foreign Direct Investments have not been implemented by them, so they remain relevant.*

Last but not least, on **inclusion of WB6 countries into the EU Rule of Law Report**, no progress has been made on since the publication of our policy study on this topic, in February 2025, on inclusion of all these countries into this mechanism. On the other hand, a look at the situation in the four countries included in this mechanism for the second consecutive year in 2025 show that overall Albania and Montenegro have made more progress in all the four areas (*justice system, anticorruption framework, media pluralism and media freedom, and institutional issues linked to checks and balances*) than North Macedonia, whereas Serbia has not made much progress in any area.

*To conclude, most recommendations of our 2025 policy brief on inclusion of WB6 into the EU Rule of Law Report have not been implemented by them, so they remain relevant.*

# Annex: Main findings of the EU Rule of Law Report on WB6 Countries Included in this Mechanism

Table 1. Main findings of the EU Rule of Law Report on Albania in 2024 and 2025

2024	2025
<b>Justice system</b>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Strengthened accountability thanks to vetting of all judges and prosecutors</li> <li>• A comprehensive legal framework in place for legal aid</li> <li>• Increased number of beneficiaries of free legal aid</li> <li>• Steps in the digitalisation of case management</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Finalisation of the vetting process of all judges and prosecutors in first instance, further strengthening accountability</li> <li>• Ongoing introduction of new digitalisation initiatives and a modern integrated electronic case management system in courts and POs</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Serious concerns about attempted interference and pressure on the judicial system by public officials or politicians</li> <li>• Shortcomings in appointment of High Judicial Council's and High Prosecutorial Council's non-magistrate members</li> <li>• Overall shortages of resources justice system risk negatively affecting the quality of justice</li> <li>• Shortcomings in the digitalisation of case management</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Remaining issues around the management of appointments and career decisions for magistrates, as well as the non-magistrate members of the High Judicial Council and the High Prosecutorial Council</li> <li>• Shortage of financial and human resources continues to have a negative effect on the quality of justice</li> </ul>

<ul style="list-style-type: none"> <li>• Length of proceedings for different kinds of cases</li> </ul>	
<p><b>Anticorruption framework</b></p>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• The anticorruption strategy being implemented</li> <li>• Working arrangements with EPPO concluded</li> <li>• A relatively broad range of officials covered by asset declaration rules</li> <li>• Increasing number of persons investigated, prosecuted and convicted for corruption</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Multi-annual anti-corruption strategy adopted</li> <li>• Declarations of assets and interests continued to be verified</li> <li>• Some steps taken towards a reform of conflict-of-interest legislation</li> <li>• Tangible progress of the Special Anti-Corruption Structure towards a solid track record in the fight against corruption, notably at high level</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Limited attention to high-risk sectors in the anticorruption strategy</li> <li>• Rules on conflict of interest for public officials are incomplete and not aligned with European standards</li> <li>• Asset declaration: shortcomings in effective verification and enforcement</li> <li>• Corruption risk sectors – an overly complex legal framework is an obstacle to progress</li> <li>• A recent amnesty law raises concerns over investigation, prosecution and conviction of corruption</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Shortcomings in effective verification and transparency of declarations of assets and interests, as declarations are not published</li> </ul>
<p><b>Media pluralism and media freedom</b></p>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• The legal framework regulating governance of public service media in place</li> </ul>	<p><i>Progress</i></p> <p>/</p>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Questions due to the political affiliation and perceived conflicts of interest of the media regulator</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Regulator’s independence remains a concerning issue due to the bi-</li> </ul>

<ul style="list-style-type: none"> <li>• Lack of a transparent distribution system for state advertising. Limited transparency of media ownership.</li> <li>• The public service media is not protected from politicisation</li> </ul>	<p>partisan formula for election of board members and their political affiliation</p> <ul style="list-style-type: none"> <li>• High concentration of media ownership continues to negatively impact media independence</li> <li>• Increased concerns as regards the independence of the public broadcaster</li> <li>• Shortcomings in terms of fair allocation of state advertising and other state resources</li> </ul>
<b><i>Institutional issues linked to checks and balances</i></b>	
<i>Progress</i>	<i>Progress</i>
<ul style="list-style-type: none"> <li>• The Constitutional Court is effective in upholding institutional checks and balances</li> </ul>	<ul style="list-style-type: none"> <li>• The Constitutional Court continued to function effectively</li> <li>• Civil society organisations remain free to operate overall</li> </ul>
<i>Challenges</i>	<i>Challenges</i>
<ul style="list-style-type: none"> <li>• Deep political polarisation has a negative impact on the legislative process</li> <li>• The Parliament has failed to comply with some Constitutional Court rulings</li> </ul>	<ul style="list-style-type: none"> <li>• Quality of the legislative process, including the effectiveness of public consultations</li> <li>• CSO environment, including on registration requirements and limited public funding</li> </ul>

Table 2. Main findings of the EU Rule of Law Report on Montenegro in 2024 and 2025

<b>2024</b>	<b>2025</b>
<b>Justice system</b>	
<i>Progress</i>	<i>Progress</i>
<ul style="list-style-type: none"> <li>• The legal framework guaranteeing judiciary's independence and impartiality revised</li> </ul>	<ul style="list-style-type: none"> <li>• Initial positive results of implementation of the previously amended legal framework</li> <li>• Improved promotion and enforcement of ethics and</li> </ul>

	<p>professional standards among judges and prosecutors</p> <ul style="list-style-type: none"> <li>• Appointment of the new President of the Supreme Court</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Serious impact on the judicial system of significant delays in judicial appointments</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Composition of the Judicial and Prosecutorial Councils remains to be further improved</li> </ul>
<p><b>Anticorruption framework</b></p>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• The anticorruption strategy adopted</li> <li>• Numerous institutions have specific codes of conduct</li> <li>• New legislation on lobbying adopted</li> <li>• Legal provisions on protection of whistleblowers have amended to align with the EU acquis</li> <li>• Working arrangements with EPPO concluded</li> <li>• Stable track record of investigations and prosecutions in cases of high-level corruption</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Ongoing implementation of the 2024-2028 strategy against corruption and action plan</li> <li>• Ongoing implementation of the improved legal framework on whistleblowers protection</li> <li>• Continuing improvement of the track record of investigations and prosecutions in high-level corruption cases</li> <li>• Slight increase of human resources devoted to the fight against corruption</li> <li>• Ongoing measures to address corruption in high-risk areas, such as implementation of integrity plans in public institutions</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Lack of trials and final decisions in cases of high-level corruption contributes to a perception of impunity</li> <li>• Ineffective Government's Code of Conduct, and pending adoption of a law with disciplinary penalties</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Monitoring of the implementation of the 2024-2028 strategy against corruption and its action plan</li> <li>• Low number of final convictions</li> <li>• Lack of effective and deterrent penalties</li> <li>• Insufficient human resources to fight corruption</li> </ul>

<ul style="list-style-type: none"> <li>• Shortfalls for specialised anti-corruption prosecution services to combat corruption</li> </ul>	<ul style="list-style-type: none"> <li>• Shortcomings in the scope, clarity and implementation of the legal framework regulating political parties' funding</li> </ul>
<p><b><i>Media pluralism and media freedom</i></b></p>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• The legal framework gives the media regulator comprehensive sanctioning instruments, including the power to impose fines in case of violations</li> <li>• The new Law on Audiovisual Media Services obliges providers of audiovisual services to provide ownership information to the media regulator</li> <li>• Recent legal reform of public service media is expected to bring positive developments both in terms of governance and funding</li> <li>• Legislative amendments provide for harsher penalties in case of violent acts or intimidation against journalists</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Improved rules on transparency of media ownership information</li> <li>• Prompt and effective institutional and law enforcement response to violence against journalists</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Information on all public sector payments made to media outlets, including institutional advertising, is limited</li> <li>• Journalists face frequent refusals by public bodies to release information</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Improved rules on transparency of media ownership information only in relation to media providers</li> <li>• The legal framework on access to information to be amended</li> <li>• Effective implementation of the legal framework on access to information</li> </ul>
<p><b><i>Institutional issues linked to checks and balances</i></b></p>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• The Ombudsperson's Office has improved its capacity to handle complaints and improve decision quality</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• A new law on the Ombudsperson's Office, being drafted, to fully align with the Paris Principles and to obtain A status accreditation</li> </ul>

<ul style="list-style-type: none"> <li>• An established framework for an inclusive legislative process</li> </ul>	<ul style="list-style-type: none"> <li>• CSOs function within an overall enabling environment</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Absence of systematic follow-up to Ombudsperson's recommendations undermines the efficiency of its work</li> <li>• Inadequate public consultation</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Effectiveness of public consultations</li> <li>• The deep crisis emerged over the decision of Parliament to unilaterally declare the retirement of a Constitutional Court judge raised concerns about the respect for its independence</li> <li>• Several persisting challenges in functioning of CSOs</li> </ul>

Table 3. Main findings of the EU Rule of Law Report on North Macedonia in 2024 and 2025

2024	2025
<b>Justice system</b>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Codes of ethics for prosecutors and judges in place</li> <li>• Steps in the digitalisation of case management</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Ongoing legislative reforms on justice system independence/autonomy</li> <li>• Measures taken across the judiciary to enhance transparency</li> <li>• Ongoing efforts to further improve digital tools</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Serious concerns about attempted interference and pressure on the judicial system by public officials or politicians</li> <li>• Concerns over Judicial Council's functioning and independence</li> <li>• Appointment decisions for public prosecutors and judges criticised by CSOs as lacking explanation and clear criteria</li> <li>• Low attractiveness of judicial careers</li> <li>• Shortcomings in the digitalisation of case management</li> <li>• Long case proceedings</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Serious concerns about the respect for judicial independence due to interference and pressure from other branches</li> <li>• Concerns regarding appointment decisions</li> <li>• Outdated digital infrastructure</li> <li>• Limited financial resources for the judiciary</li> </ul>
<b>Anticorruption framework</b>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Working arrangements with EPPO concluded</li> <li>• Legal framework and lobbying registers in place</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Prosecution's strengthened capacity for investigation</li> <li>• Improved inter-institutional collaboration between the prosecution and other institutions</li> </ul>
<p><i>Challenges</i></p>	<p><i>Challenges</i></p>

<ul style="list-style-type: none"> <li>• Slow implementation of the anticorruption strategy</li> <li>• Weakened criminal code affects negatively the prosecution of corruption, especially high-level corruption</li> <li>• A weak system for violations of the rules on conflicts of interest</li> <li>• Resource constraints</li> <li>• The law on protection of whistleblowers is not up to date</li> <li>• No registration for lobbyists</li> <li>• Lack of cooperation between national authorities</li> </ul>	<ul style="list-style-type: none"> <li>• Insufficient implementation of the anticorruption strategy</li> <li>• Criminal code amendments (2023) hinder efforts to combat corruption, in particular high-level level corruption</li> <li>• Delays in court proceedings</li> <li>• Resource constraints</li> </ul>
<p><b><i>Media pluralism and media freedom</i></b></p>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• The legal framework on governance of public service in place</li> <li>• Print and broadcast media required to disclose ownership information to the audiovisual media regulatory body</li> <li>• Ownership registry for digital national media in place</li> <li>• Harsher penalties against violent acts or intimidation against journalists in place by law</li> <li>• The margin to initiate SLAPP cases against media organisations and journalists restricted by law</li> <li>• Decreased fines for defamation introduced by law</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Improved financial independence of media regulators</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Concerns over certain elements of a new law covering state-funded advertising</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Concerns among media experts and CSOs over the reintroduction of state-funded advertising</li> </ul>

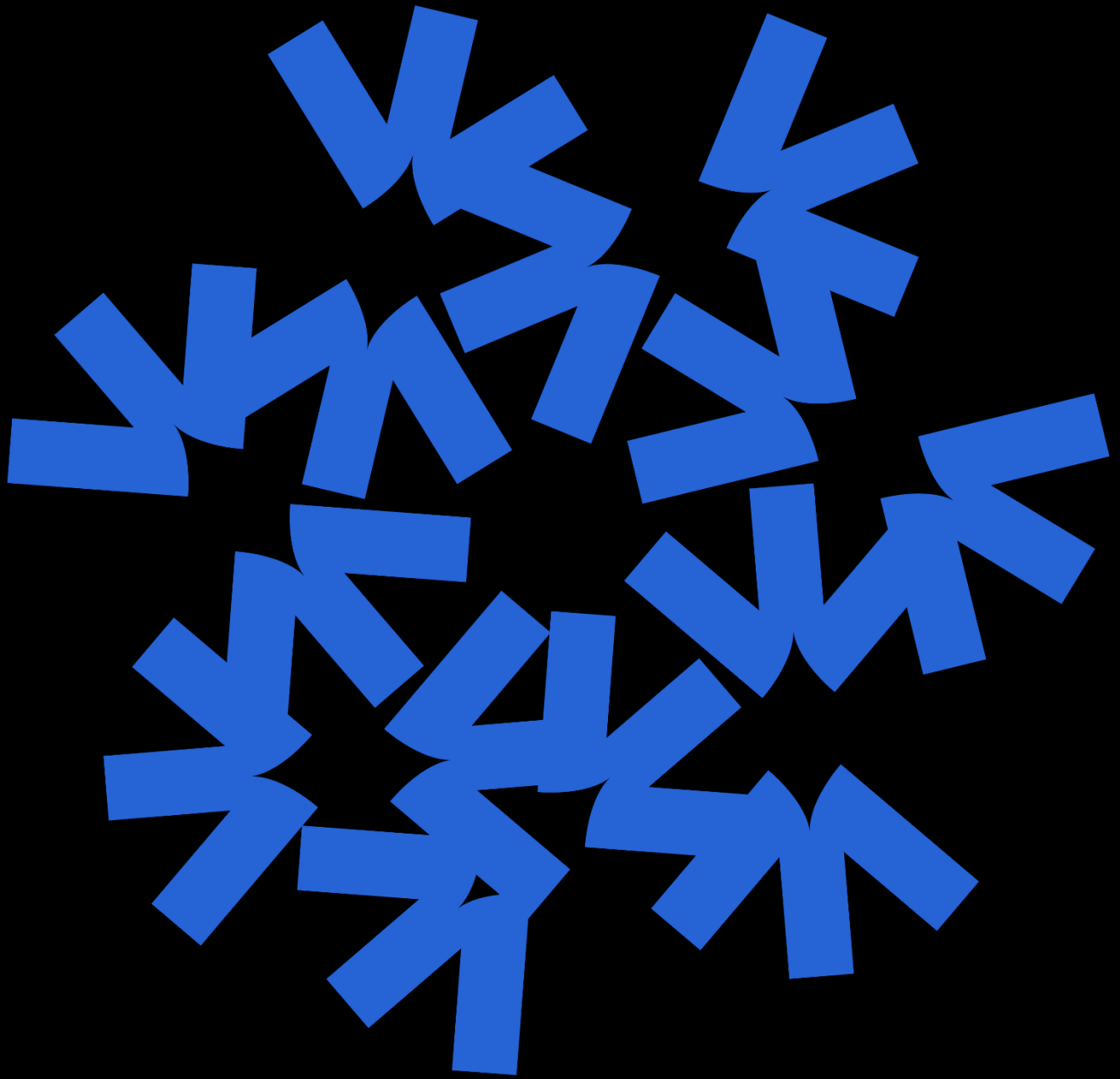
<ul style="list-style-type: none"> <li>• Unstable funding of public service media</li> <li>• The public service media not protected from politicisation</li> </ul>	
<p><b><i>Institutional issues linked to checks and balances</i></b></p>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• A national electronic public consultation system in place</li> <li>• An overall enabling environment for CSOs</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Measures to enhance cooperation with civil society initiated by the Government</li> <li>• Strengthened role of the Constitutional Court in monitoring and enforcement of its decisions</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Delays in the work of the parliament due to deep political polarisation</li> <li>• Excessive and sometimes inappropriate use of accelerated legislative procedures due to deep political polarisation</li> <li>• Not all draft laws are published on the national electronic consultation platform</li> <li>• Ensuring sustainable engagement of CSOs in policymaking</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Shortcomings in implementing processes for inclusive and evidence-based policymaking</li> <li>• Challenges raised by civil society, including online hate speech</li> </ul>

Table 4. Main findings of the EU Rule of Law Report on Serbia in 2024 and 2025

2024	2025
<b>Justice system</b>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• Constitutional reform to strengthen judicial independence being followed up</li> <li>• Laws on the Public Prosecution Office and the High Prosecutorial Council allow prosecutors to complain against mandatory instructions</li> <li>• The High Judicial Council and the High Prosecutorial Council in their new composition established</li> <li>• A Strategy on Human Resources in the Judiciary being implemented</li> <li>• Steps in the digitalisation of case management</li> <li>• A positive trend in reducing the length of cases</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• A new prosecutorial case management system being implemented</li> <li>• Overall a positive picture for civil, commercial, and criminal cases</li> </ul>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Serious concerns about attempted interference and pressure on the judicial system by public officials or politicians</li> <li>• A considerable number of vacancies for judges and prosecutors to be filled</li> <li>• Low attractiveness of judicial careers poses a challenge</li> <li>• Shortcomings in the digitalisation of case management</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• High political pressure on the judiciary and prosecution services, with little or no follow-up by justice system management bodies, the Government or Parliament</li> <li>• Concerns with regard to prosecutorial autonomy</li> <li>• Effectiveness and confidentiality of criminal investigations hampered by shortcomings in law and practice</li> <li>• Serious challenges in the handling of administrative cases and constitutional complaints</li> </ul>
<b>Anticorruption framework</b>	
<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• The anticorruption strategy being finalized</li> </ul>	<p><i>Progress</i></p> <ul style="list-style-type: none"> <li>• A multi-annual anticorruption strategy adopted</li> </ul>

<ul style="list-style-type: none"> <li>• A relatively broad range of officials covered by asset declaration rules</li> <li>• Increased number of final convictions in high-level corruption cases</li> </ul>	
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Asset declaration: shortcomings in effective verification and enforcement</li> <li>• Further improvements needed to establish a solid track record on investigations, indictments and final convictions</li> <li>• Working arrangements with EPPO not yet concluded</li> <li>• Shortfalls for specialised anticorruption prosecution services to combat corruption</li> <li>• Corruption risk sectors: several exemptions from the public procurement law widely used to circumvent the application of the existing procurement rule</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Continued weaknesses in the verification of asset declarations and conflicts of interest</li> <li>• Establishing a robust track record of investigations, indictments and final convictions in high-level corruption</li> <li>• Insufficient human resources limit capacities of the Organised Crime Prosecutor’s Office to process and investigate complex organised crime and high-level corruption cases</li> <li>• Corruption risk sectors: continued widely used exemptions to the public procurement</li> <li>• Corruption risk sectors: insufficient oversight mechanisms in public procurement</li> </ul>
<p><b><i>Media pluralism and media freedom</i></b></p>	
<p><i>Progress (no progress reported)</i></p>	<p><i>Progress (no progress reported)</i></p>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Failure by the media regulator to fully exercise its mandate to safeguard media pluralism and professional standards</li> <li>• Serious concerns about the independence of the media regulator</li> <li>• Measures to increase media ownership transparency not yet fully implemented</li> <li>• Journalists face frequent refusals by public bodies to release information</li> <li>• Concerns of political and economic influence on the media</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Measures to increase transparency in ownership structures and public funding of the media sector only partially implemented</li> <li>• Journalists’ safety has become a source of increasing concern</li> <li>• Increased concerns as regards public broadcaster’s independence</li> </ul>

<ul style="list-style-type: none"> <li>• Issues of editorial autonomy and pluralism of public service media</li> </ul>	
<p><b><i>Institutional issues linked to checks and balances</i></b></p>	
<p><i>Progress</i> (no progress reported)</p>	<p><i>Progress</i> (no progress reported)</p>
<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Parliament’s weakness to provide checks and balances due to issues of effectiveness, autonomy and transparency</li> <li>• Several vacancies at the Constitutional Court</li> <li>• No systematic follow-up on recommendations of independent bodies</li> <li>• Weak public consultation process</li> <li>• Lack of an enabling environment for establishment, operations and financing of CSOs</li> <li>• Smear campaigns against several CSOs</li> </ul>	<p><i>Challenges</i></p> <ul style="list-style-type: none"> <li>• Parliament’s effectiveness and oversight function hampered by a low frequency of sessions and lack of genuine political debate</li> <li>• Inefficiency of the Constitutional Court because four positions remain vacant</li> <li>• Increasing pressure and attacks against CSOs</li> <li>• Use of spyware by authorities to unlawfully target journalists, environmental activists and other individuals</li> </ul>



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